

# TOLEDO TOGETHER

A GUIDING VISION & 10-YEAR ACTION PLAN FOR HOUSING

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## ACKNOWLEDGEMENTS

*Toledo Together: A Guiding Vision and 10-Year Action Plan for Housing*, Toledo's comprehensive housing strategy, was developed in partnership with Enterprise Community Partners, Inc. on behalf of the City of Toledo's Department of Neighborhoods. *Toledo Together* was created through an extensive engagement process spearheaded by an Advisory Group and supported by several engagement activities, including focus groups, stakeholder interviews, surveys, and public meetings.

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## TABLE OF CONTENTS

Acknowledgements .....	2
Section 1: Introduction .....	6
Section 2: Toledo’s Housing Needs.....	9
Section 3. Recommended Strategies .....	14
Strategy Area #1. Land Use And Entitlements .....	20
Strategy Area #2. Housing Policies And Programs .....	24
Strategy Area #3. Neighborhood Empowerment .....	31
Strategy Area #4. Resources And Capital .....	38
Section 4. Implementing Toledo’s Comprehensive Housing Strategy.....	43
Endnotes.....	63

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## SECTION 01: INTRODUCTION

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### WHAT IS TOLEDO'S GUIDING VISION AND 10-YEAR ACTION PLAN FOR HOUSING?

*Toledo Together: A Guiding Vision & 10-Year Action Plan for Housing* establishes a unified vision for housing investments in the City of Toledo and a roadmap to achieve this vision over the next 10 years.

It focuses on addressing disparities and advancing racial equity, while creating policies and programs that will benefit everyone, such as an improved environment for residential and mixed-use development. In addition, *Together Toledo* is designed to build public and political support, increased capacity for implementation, and connections across community issues.

Stakeholders in Toledo expressed a desire to see this strategy result in demonstrable change – change in the homes and neighborhoods in Toledo (in terms of housing equity, housing quality, overall development practices, and affordability) and change in the lives of individuals and families (in terms of being well-supported by housing programs and becoming homeowners). As one stakeholder put it, success means “We can...see actual change in our housing landscape.”

To support this change, this document ends with a 10-Year Action Plan, which will guide implementation. This action plan includes a timeline for implementation; roles for lead implementers; resources to support implementation; and metrics to measure and track change over time.

#### **Why now?**

Residents in the City of Toledo continue to experience the legacy of population decline and property vacancy and abandonment.

Existing homes pose significant health and safety hazards, and few new homes have been built in the city, including those that could provide alternatives for seniors (who make up 14 percent of Toledo's population) to downsize or age in place and new residents to locate into the city limits. It is increasingly difficult for Toledo residents to become homeowners. And for Black households, disparities in accessing homeownership, including encountering appraisal gaps or finding mortgage products to fit their needs, have worsened.

One in three Toledo households devote a large share of their income to housing costs, and their incomes has not kept pace with rent and home prices. This burden falls hardest on those with the lowest incomes and seniors, Black households, and single parents, who face housing instability at higher rates than the average Toledoan.

At the same time, the city's vacant properties; more place-based initiatives; and stronger policies and programs to support homeownership and health and safety in Toledo homes present opportunities for greater impact. With these opportunities as a launch pad, the City of Toledo has started to paint a vision of what Toledo can be in the future. Planning efforts like *Forward Toledo: Exploratory Framework Assessment* and the upcoming comprehensive plan update outline a powerful path forward for the city, focused on increased housing opportunities and the vitality of the downtown and surrounding neighborhoods. And the City of Toledo can lead this effort through its housing investments, its partnerships, and its own decisions across housing, land use and economic development to result in demonstrable change.

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### WHAT WILL THE PLAN ACCOMPLISH?

## [Visual content of vision]

Source: Toledo Comprehensive Housing Strategy Advisory Group Meeting #2

Toledo's Comprehensive Housing Strategy is focused on achieving a unified vision for homes in Toledo. The five points of this star are:

### Vibrant neighborhoods

Neighborhoods that demonstrate pride and care for them through things like abundant green space and reduced blight.

### Stable housing

A stable housing environment with homes for families; increased opportunities for homeownership and tenant education; access to resources; rehabilitated homes; and the ability to age in place.

### Equity and diversity

A diverse and equitable community that works to deconcentrate poverty, builds more affordable housing in areas of opportunity and inclusivity, and addresses the racial wealth gap.

### Strong partnerships

A strong, well-resourced partnerships to achieve housing goals, including positive relationships with the government, school systems, financial institutions, labor and trade organizations, landlords, and tenants.

### Improved market conditions

A community where market conditions are improving steadily through housing investments.

When all five points of this star are addressed, Toledo will have achieved its housing vision. To understand how implementation of Together Toledo is working to achieve this vision, Section 4 outlines a set of metrics to track progress over time, including:

- At least 2,500 rental homes for extremely low-income households
- At least 1,000 LeadSafe certifications will be issued
- A 6 percent increase in homeownership among Black, Indigenous, or households of color
- A 5 percent drop in housing vacancy

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## HOW WAS IT DEVELOPED?

*Together Toledo* was developed through an extensive process involving document review, data analysis, and stakeholder engagement inclusive of a range of perspectives from across Toledo and the State of Ohio (see Appendices 1–3 for summaries of the key tasks supporting this process). It will be important to continue this type of engagement with stakeholders and Toledo residents during implementation of this strategy. Engagement took place in all three phases of developing *Together Toledo* through virtual tactics such as online meetings, flash polling, and online surveys. It also was conducted at various scales from one-on-one interviews to small roundtable or focus group discussions to large stakeholder meetings.

Essential to this process was the Comprehensive Housing Strategy Advisory Group. The advisory group was a large stakeholder body formed at the onset of the planning process to build a common vision for housing, set priorities around housing needs and strategies, advise on local context, and build momentum for implementation. Through five meetings, conducted virtually, the advisory group played a critical role in moving the strategy from an idea to a completed strategy, that is ready for the City of Toledo and its partners to act on.

Engagement activities included:

- Five Advisory Group meetings
- Four stakeholder roundtables focused on housing policies and programs, land use and entitlements, neighborhood empowerment, and resources and capital
- 18+ interviews with City and State of Ohio staff, elected officials, local housing partners (Lucas County Land Bank, Lucas Metropolitan Housing Authority, Neighborworks Toledo, the Toledo Design Collective, ProMedica, LISC Toledo, and Habitat for Humanity); and financial institutions
- Four focus groups with non-profit and for-profit housing developers and financial institutions
- One public comment period
- Two public presentations

For materials from these activities, including public comments received, see Appendices 4–6.

**[Visual content: timeline of process]**

*Together Toledo* kicked off in October 2020 and culminated with adoption by Toledo City Council in August 2021.

The timeline below highlights key milestones during the planning process.

- October 2020: Project Kickoff and Advisory Group Meeting #1
- October 2020—February 2021: Baseline Conditions Analysis
- December 2020: Advisory Group Meeting #2 (Establishing a North Star Vision for the Plan)
- February 2021: Advisory Group Meeting #3 (Sharing Key Data Findings)
- February – April 2021: Recommended Actions
- April 2021: Advisory Group Meeting #4 (Prioritizing Strategies)
- May–October 2021: Development and Delivery of the Plan
- June 2021: Advisory Group Meeting #5 (Finalizing the Draft Plan)
- June–July 2021: Public Comment Period
- August 2021: City Council Review and Adoption
- October 2021: Implementation begins



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## SECTION 02: TOLEDO'S HOUSING NEEDS

To inform *Together Toledo*, the City of Toledo completed a quantitative data analysis of housing market conditions; housing needs; and general population and demographic trends. This analysis also incorporates qualitative data collected through the stakeholder engagement process for this comprehensive housing strategy and findings from other recent plans and studies (for a more detailed summary, see Appendix 1).<sup>i</sup>

Toledo lost 2,542 households since 2010, and new housing production slowed in Toledo concurrent with population loss and increased vacancy, with only 4 percent of existing homes built after 2000. Projections suggest a net loss of about 1,600 additional households between 2018 and 2025. Although projections suggest that households moving out of the Toledo will outpace those moving to the city, there will still be many current and new residents seeking different housing options during this time period.<sup>ii</sup> Projections also suggest that approximately 1,200 homes will be coming back online through activities like redevelopment and new development over the next five years too. Of these homes, about 41 percent of future homes need to be priced for households with incomes above \$50,000, while 20 percent of these units will need to be priced for households with incomes below \$15,000.

This trend presents an opportunity for the City of Toledo to focus on supporting its existing residents, many of whom are not well-served by the city's existing homes in terms of features, quality, or affordability, and invest in a high quality-of-life for them. Having more housing diversity will enable existing residents to remain in Toledo as they age and look to downsize, start families, or take in loved ones. At the same time, more types of homes, coupled with building on the City of Toledo's existing assets such as its arts and cultural institutions, historic neighborhoods and homes, and waterfront, can be used to retain or attract recent graduates; employees; and more families to the city over time.

### Housing market conditions

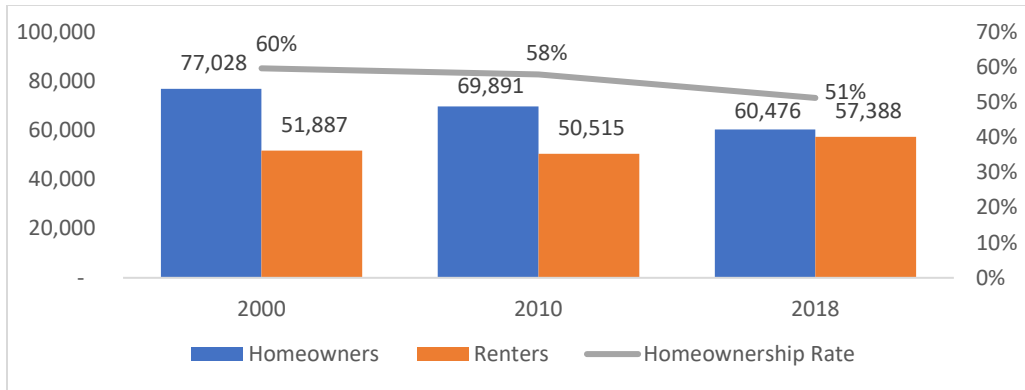
- **Toledo's rental market:** From 2010 to 2018, median rent in Toledo largely remained unchanged, with a slight decline from \$706 to \$700 in 2018 inflation-adjusted dollars.<sup>iii</sup> More recent trends suggests rents have increased, resulting in steeper costs for renters looking for housing in the last two years. From 2018 to 2020, median rent in Toledo rose 2 percent, from \$837 to \$860 (in 2018 inflation-adjusted dollars).<sup>iv</sup> This rent level is not affordable to workers in Toledo earning the median wage working in retail, food services, or arts and entertainment jobs, which account for 24 percent of the city's workforce. Workers in these industries can afford rents between \$350 and \$500 a month.

Renting is becoming more common among Toledo households, a trend consistent in both Lucas County and nationally. However, this growth occurred in Toledo at a higher rate: After the Great Recession, there was a small increase in renting across the United States (from 33 percent in 2010 to 36 percent in 2018).<sup>v</sup> From 2010 to 2018, Toledo experienced a 7 percent growth in renters, which represent 49 percent of all households (Figure 1).

- **Toledo's homeownership market:** From 2010 to 2018, the median home value in Toledo decreased by 28 percent (\$110,386 to \$79,900 in 2018 inflation-adjusted dollars).<sup>vi</sup> However, a snapshot of recent for-sale trends suggests that home values in Toledo have been on the rise. From 2018 to 2020, median home value rose from \$66,815 to \$79,364 (in 2018 inflation-adjusted dollars).<sup>vii</sup> Workers in Toledo earning a median wage in the manufacturing, transportation, construction, finance and public administration industries, which account for 33 percent of the workforce, are generally well-positioned to afford homes price at \$79,364.<sup>viii</sup>

During the same period, the homeownership rate in Toledo dropped by a 7 percent (58 percent to 51 percent; see Figure 1).

**Figure 1. Homeownership rate and housing tenure, Toledo, OH (2018)**

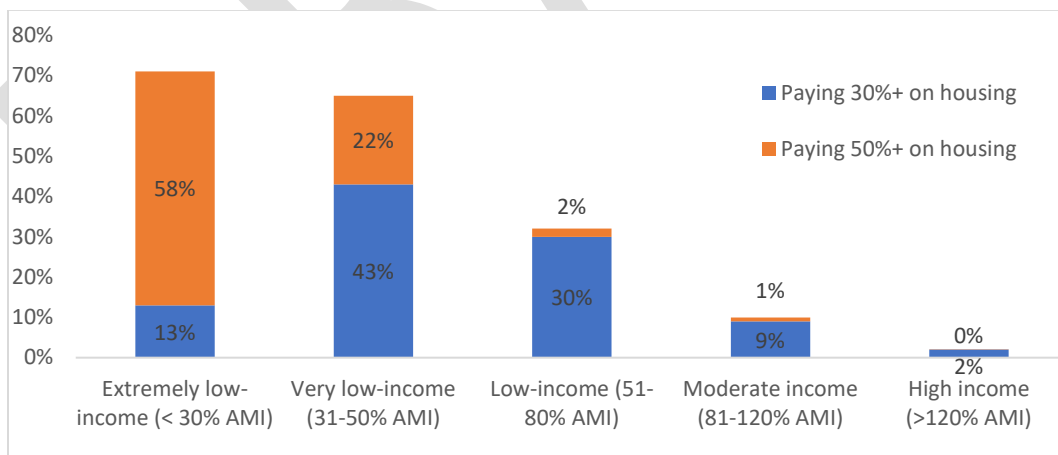


Source: 2000 Decennial Census and 2010 & 2018 American Community Survey 5-Year Estimates

- Housing affordability:** Toledoans face housing affordability challenges, making it difficult for them to access or stay in their home, despite unchanged rents or lower home values in the city’s housing market over the last several years. Around one-third of households (38,575 households) in Toledo pay at least 30 percent of their income for housing costs. Of those households, half of them (19,350 households) are considered “severely cost-burdened,” meaning they pay more than 50 percent of their income for housing costs.

While one-third of Toledoans experience cost-burdens citywide, some groups experience this burden at higher rates. Renters living in Toledo are more likely to experience cost-burdens than homeowners (46 percent of renters compared with 21 percent of owners).<sup>ix</sup> Lower-income households in Toledo experience cost-burdens at higher rates and more severely compared to moderate- and high-income households (see Figure 2). While there are many local housing programs and services to aid renters and homeowners, stakeholders emphasized better connections to them, including providing program information in different languages (specifically Spanish).

**Figure 2. Cost-burdened households by income, Toledo, OH (2017)**



Source: 2017 HUD Comprehensive Housing Affordability Strategy

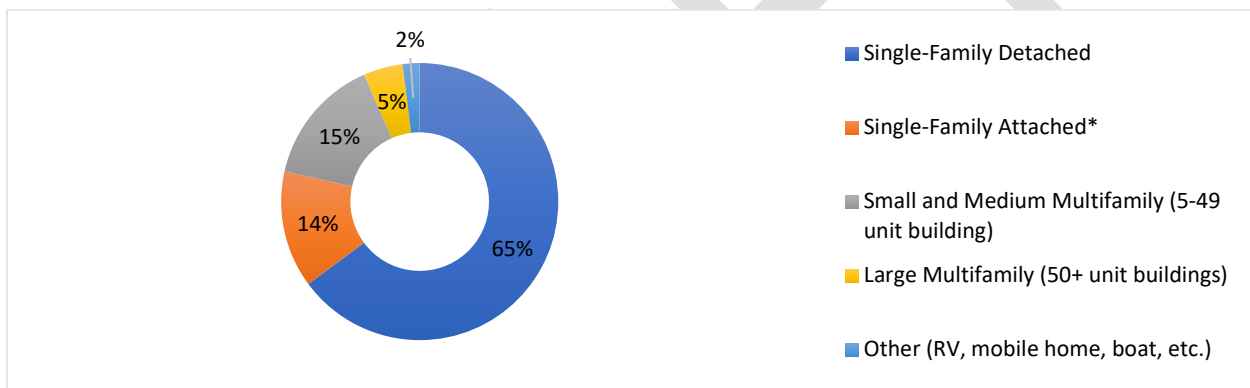
### Core housing needs

Based on the analysis completed for this comprehensive housing strategy, a core set of housing needs emerged:

- Limited housing diversity:** In general, demographic trends in Toledo suggest a shift away from family households to single-person households, with the average household size declining over time, suggesting a need for a range of housing options, ranging in type, price and household lifestyle. However, most homes in Toledo (65 percent) are single-family detached, with most of Toledo’s land zoned for this type of development (see Figure 3). As a result, citywide, Toledo has a large supply of single-family homes, with fewer housing options available. Two out of every five of these homes are occupied by one person.<sup>x</sup> Single-person households make up 37 percent of all households in Toledo while homes designed to serve them (studio and one-bedroom units) account for only 14 percent of the city’s housing supply.<sup>xi</sup>

Limited options include what is often referred to as “missing middle homes,” which range from attached homes (such as townhomes or duplexes) to smaller multifamily buildings and are designed to fit in with existing neighborhoods in terms of scale and form.<sup>xii</sup> Neighborhoods in the core of Toledo, bordering downtown and neighborhoods in northwest Toledo are largely comprised of single-family homes, whereas neighborhoods in southwest Toledo, along Airport Highway and south of Ottawa Hills have more housing diversity. Input from developers, along with demographic trends, suggest increasing demand for smaller units; homes or units with accessible features; homes for multigenerational families; and more multifamily development, which experienced an uptick in recent years.

**Figure 3. Housing Type, Toledo, OH 2018**



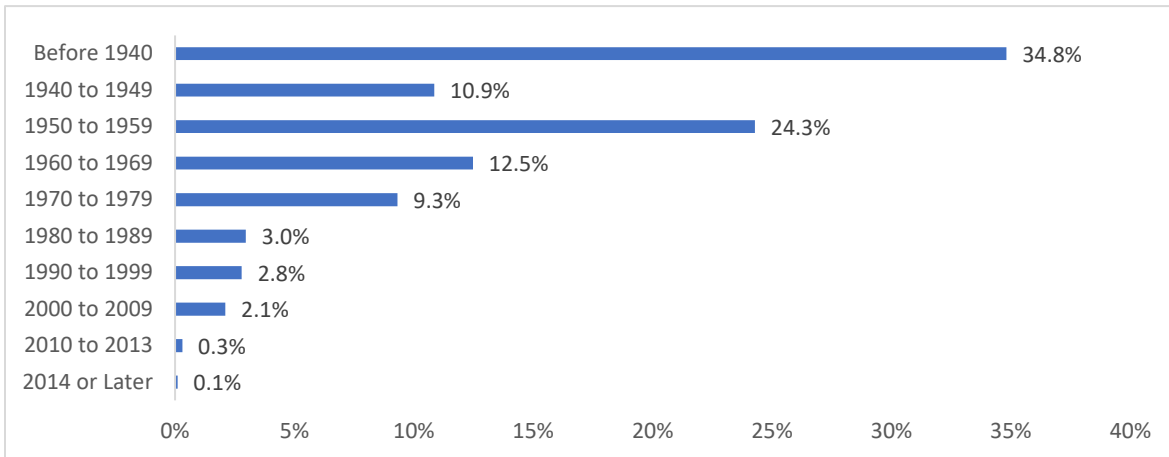
Source: U.S. Census Bureau, 2018 5-Year American Community Survey Estimates

\*Includes attached homes, townhomes, duplexes, triplexes, and quads.

- Vacant properties:** In total, Toledo has 20,243 vacant properties, which represents 15 percent of its housing stock, and vacancy increased slightly from 1 percent from 2010 to 2018. Stakeholders see the city’s vacant property as both a challenge (in terms of code enforcement and public safety costs) but also an opportunity to increase and diversify homes in Toledo.
- Rehabilitation and repair of owner-occupied homes:** Most owner-occupied homes in Toledo were built prior to 1980 (92 percent of all homes) (see Figure 4). These older homes pose health and safety hazards, including the presumed presence of lead, to Toledo residents and may be costly to maintain over time.<sup>xiii</sup> Local leaders reported the challenge of rehabilitating these properties, given homes’ age and the sheer number of homes throughout Toledo in need of repair.

They also highlighted the impact the age and quality of homes have on seniors who want to age in place and persons with disabilities in Toledo. Today, many of Toledo’s homes are not suitable for these residents, but few alternatives are available to them. Additionally, developers who participated in the focus groups for this comprehensive housing strategy shared an ongoing need for more financial resources rehabilitate homes and make them more accessible for Toledoans.

**Figure 4. Year built of owner-occupied homes, Toledo, OH (2018)**

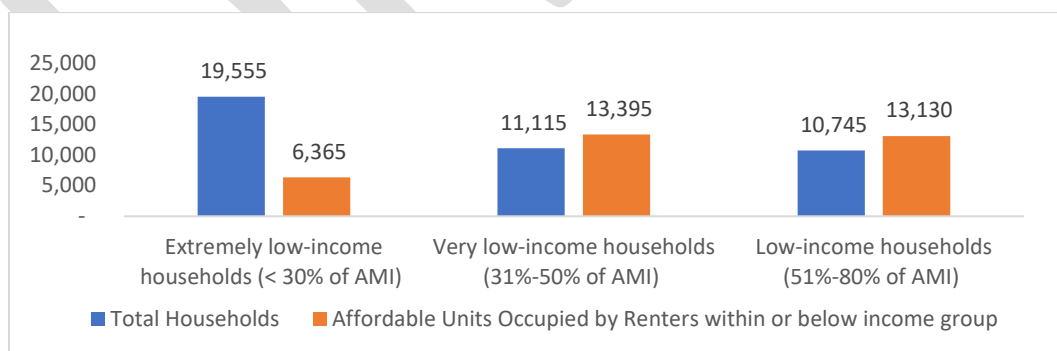


Source: 2018 American Community Survey 5-Year Estimates

- Limited supply of affordable rental homes:** Toledo lacks enough rental homes for extremely low-income individuals and families (equivalent to \$17,250 annually for a 2-person household according to HUD-defined income categories).<sup>xiv</sup> There is a shortage of 12,705 affordable and available rentals for extremely low-income renter households (Figure 5). In other words, for every 100 extremely low-income renters only 35 units are affordable and available to them. Most of these units are concentrated in neighborhoods along Airport Highway and in neighborhoods bordering downtown Toledo, which also face high levels of vacancy and poverty rates among households.

This overall shortage, coupled with small increases in rents (from \$879 to \$904 between 2018 and 2020) and demand for lower cost units among higher-income renters, makes it increasingly difficult for extremely low-income households, among other renters, to find affordable homes in the city.<sup>xv</sup>

**Figure 5. Income group by affordable occupied rental units, Toledo OH (2017)**



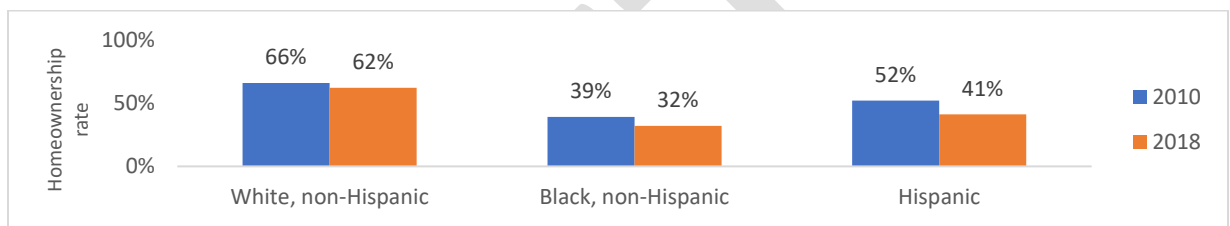
Source: 2017 HUD Comprehensive Housing Affordability Strategy

- Potential loss of affordable rental homes:** The loss of affordable rental homes, subsidized and unsubsidized, would shrink the city’s affordable rental supply for lower-income households and pose a threat to Toledo’s already limited housing diversity. Only a small number of rental units in Toledo receive a federal subsidy (6,800 units out of 62,130 total rental units).<sup>xvi</sup> These units are primarily located in neighborhoods along Airport Highway and around downtown Toledo.

Toledo could lose more than 1,500 units in the next decade due to expiring subsidies (although these units can also be lost through deteriorating property conditions too). Nationwide, small and medium multifamily units (5 to 49 units) are a critical supply of affordable housing for lower-income households. These rental multifamily units in Toledo are already limited (29 percent of Toledo’s rentals), and if lost, could make it challenging to replace.

- More pathways to homeownership:** Homeownership has declined in Toledo. From 2010 to 2018, the homeownership rate in Toledo dropped from 58 percent to 51 percent; Black households’ homeownership rate dropped from 39 percent to 32 percent (Figure 6).<sup>xvii</sup> Stakeholders noted the need to expand and support homeownership programs to help more people own a home, including addressing the stringent barriers that affect people’s ability to qualify for a mortgage. They also connected these disparities in accessing mortgages and credit products to redlining in the 1930s.<sup>xviii</sup>

**Figure 6. Homeownership rate by race and ethnicity, Toledo, OH (2018)**



Sources: 2010 & 2018 American Community Survey 5-Year Estimates

- Inequity in housing outcomes:** Housing indicators show seniors, single parents, and Black households face higher-than-average levels of housing instability. More than one-third of seniors (36 percent) and Black households (36 percent) are cost-burdened. Single-parent households face high levels of poverty (10,588 households).<sup>xix</sup> Unstable housing situations can persist or worsen without robust fair housing education, monitoring, and enforcement, which stakeholders noted was a gap, among other types of assistance.
- Inequity in neighborhood conditions:** Many households’ needs extend beyond their home and in some parts of the city, affect entire neighborhoods. Some neighborhoods in Toledo have high shares of vacant and tax delinquent properties and racial equity gaps in education and employment levels, along with limited access to destinations such as job centers or amenities such as greenspace. Many of these needs converge in a few neighborhoods around downtown Toledo, suggesting a need for holistic, place-based initiatives that address a wide range of household needs. For instance, in 2018, the unemployment rate among Black Toledoans was 16.4 percent, about 11 percentage points higher than the unemployment rate citywide.<sup>xx</sup> Part of this issue has been exacerbated by the loss of community development corporations over the last several decades who were able to drive place-based investment in neighborhoods.
- Barriers to residential development:** The City of Toledo’s enabling environment creates uncertainty and risk for subsidized and market-rate residential and mixed-used development. Developers cited lack of a clear and consistent regulatory environment; misaligned zoning and land use relative to housing demand; and difficulty accessing and assembling private financing as key barriers.

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## SECTION 03: RECOMMENDED STRATEGIES

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### TOLEDO'S STRATEGIC FRAMEWORK FOR HOUSING

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Over the next 10 years, the City of Toledo, with its partners and Toledo residents, will act to address its core housing needs. *Together Toledo* includes four strategy areas where change is needed to move toward Toledo's housing vision:

1. **Land use and entitlements:** This strategy area removes significant development barriers for new development, limited flexibility in existing zoning, and increased risk in development due to additional approvals or requests.
2. **Housing policies and programs:** This strategy area provides the framework for a cohesive housing policy, addresses the gap between policy and implementation, builds greater alignment to maximize available resources, and creates new tools to support housing activities.
3. **Resources and capital:** This strategy area increases the amount of potential resources relative to need, removes significant barriers for new development, and creates additional diversity in resources, including more flexible local ones.
4. **Neighborhood empowerment:** This strategy area increases community-based capacity, neighborhood voice in local decisions and economic mobility tools to enhance housing stability.

Each strategy area outlines a series of strategies (how the City of Toledo and its partners will move from where they are to where they want to go) and actions (key, measurable steps to move each strategy forward).<sup>xxi</sup> They also include three cross-cutting factors that will be central to the success of all strategies:

- **Capacity:** The abilities needed to implement the strategy, by the community as well as various institutions.
- **Collaboration:** The identification of opportunities and roles to build new or stronger partnerships between the City of Toledo and key implementation partners.
- **Equity:** How the strategies will increase equity (including avoiding any negative impacts), which in this case means addressing disparities in housing needs among Toledo residents and the root causes associated with these disparities and working to eliminate barriers that have prevented the participation of those most affected by housing needs.

Together, the strategies, actions, and cross-cutting factors facilitate implementation. This document provides a 10-Year Action Plan and evaluative tools to assess progress of the actions outlined below (see Section 4).

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### PRIORITY NEEDS & STRATEGIES [GRAPHIC]

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Stakeholders on Toledo's Comprehensive Housing Strategy Advisory Group elevated three priority needs and strategies that the City of Toledo, community residents, and nonprofit, private-sector, and philanthropic partners should be focused on over the next 10 years.

#### Priority needs

- Rehabilitation and repair of owner-occupied homes
- More pathways to homeownership
- Inequity in neighborhood conditions

#### Priority strategies

- Create a local, dedicated source for housing activities.
- Develop a sustainable source of funding for community reinvestment.
- Adopt a cohesive housing, economic development, and land use policy framework.

Table 1 aligns the nine needs identified through the planning process (and summarized in Section 2) with the strategies further described below.

**Table 1. Alignment of Housing Needs and Strategies**

Strategy		More pathways to homeownership*	Rehabilitation and repair of owner-occupied homes*	Inequity in neighborhood conditions*	Limited housing diversity	Vacant properties	Limited supply of affordable rental homes	Potential loss of affordable rental homes	Inequity in housing outcomes	Barriers to residential development
LAND USE AND ENTITLEMENTS	1.1	Expand by-right zoning for higher density development.	✓		✓	✓	✓	✓	✓	✓
	1.2	Expand by-right zoning for missing middle housing types.	✓		✓	✓	✓			✓
	1.3	Develop by-right zoning for infill development.	✓		✓	✓	✓	✓	✓	✓
	1.4	Amend zoning standards to support group living facilities.			✓	✓	✓	✓	✓	✓
	1.5	Increase neighborhood planning.	✓		✓	✓	✓	✓	✓	✓
	1.6	Create new tools to lower development costs.	✓		✓	✓	✓	✓	✓	✓
	1.7	Increase transparency and predictability of	✓	✓	✓	✓	✓	✓	✓	✓

		development decisions.									
HOUSING POLICIES AND PROGRAMS	2.1	Adopt a cohesive housing, economic development, and land use policy framework.	√	√	√	√	√	√	√	√	√
	2.2	Create a local, dedicated source for housing activities.	√	√	√	√	√	√	√		√
	2.3	Improve delivery and effectiveness of existing public and nonprofit programs.			√					√	
	2.4	Expand community revitalization areas.		√	√	√	√	√	√	√	√
	2.5	Establish a redevelopment authority (RDA) to facilitate property reuse and redevelopment.			√	√	√	√	√	√	√
	2.6	Create a rental registry for housing health and safety standards.			√					√	
	2.7	Increase tenant protections enforcement and resolution infrastructure.			√					√	
	2.8	Expand existing tenant protections.			√					√	
	2.9	Develop a policy to guide union labor	√	√	√						√



		requirements in residential development.									
	2.10	Develop a preservation strategy for unsubsidized affordable multifamily properties.			√	√		√	√		
NEIGHBORHOOD EMPOWERMENT	3.1	Increase homeowner assistance in historically redlined communities.	√		√					√	
	3.2	Build capacity at community-based organizations.			√					√	
	3.3	Complete comprehensive blight removal in Toledo neighborhoods.		√	√		√		√	√	√
	3.4	Establish community ownership models.	√				√	√		√	√
	3.5	Connect redevelopment projects and workforce development initiatives.		√	√	√	√	√		√	√
	3.6	Invest in quality of life improvements in tandem with housing investments.			√		√			√	
	3.7	Increase fair housing education.	√		√	√		√		√	√
	3.8	Conduct ongoing public outreach about housing needs	√	√	√	√				√	√

		and available resources.									
	3.9	Launch a public education campaign about housing for elected leaders.	√	√	√	√	√	√		√	√
	3.10	Conduct outreach to landlords and tenants about Toledo's source of income policy.			√			√		√	
RESOURCES AND CAPITAL	4.1	Develop a place-based source of funding for community reinvestment.			√		√	√	√	√	√
	4.2	Create a LeadSafe implementation fund.			√		√	√	√	√	√
	4.3	Diversify funding sources to support housing activities.	√	√	√	√	√	√	√		
	4.4	Increase competitiveness for state housing resources.			√	√		√	√		√
	4.5	Diversify mortgage products for homeowners and homebuyers.	√	√	√					√	
	4.6	Create local tax relief for eligible homeowners.	√		√					√	
	4.7	Create tax relief for eligible renters.	√		√			√	√	√	

4.8	Build capacity and commitment among institutional partners.	√	√	√					√	
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DRAFT

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## STRATEGY AREA #1. LAND USE AND ENTITLEMENTS

### WHAT IS THIS STRATEGY AREA?

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Achieving the City of Toledo’s vision for homes requires a supportive enabling environment—what the Center for Community Investment defines as the “policies, practices, and relationships that can make those deals and projects happen in ways that advance community interests and protect community assets.”<sup>xxii</sup> One part of this enabling environment is land use and development policies and practices, which affect things like how quickly and simply projects get built to what types of homes are created to where these homes are located.

This strategy area—land use and entitlements—is designed to align the City of Toledo's land use and development processes with its housing goals and activities. Currently, the local regulatory environment adds complexity and uncertainty to the development process, making it riskier to pursue development in Toledo than it otherwise might be. And mistrust between developers, the City of Toledo, and community members exacerbates this situation, further limiting development potential and collaboration on opportunities.

The strategies highlighted below will increase flexibility and consistency in the development of residential and mixed-use projects. In turn, a more consistent foundation for Toledo’s development process will help to minimize risk and costs for developers when building or redeveloping within the city. In addition, these strategies should inform Toledo’s upcoming Comprehensive Plan update, which started in Summer 2021. This process provides an opportunity to make long-term changes to the City’s land use policies and to engage community members and developers on how these policies can look and what they could mean in individual neighborhoods at an early stage.

Strategies related to land use and entitlements on the following pages will accomplish three key changes over the next 10 years:

- **More flexibility in the zoning process** by creating zoning categories that are inclusive of development that addresses Toledoans’ housing needs.
- **More consistency in the development process** by creating simpler guidelines for development decisions and in turn reduce costs associated with the risks of development.
- **Increased engagement and communication opportunities around housing and land use decisions** to promote trust and awareness among stakeholders.

### STRATEGY 1.1. EXPAND BY-RIGHT ZONING FOR HIGHER DENSITY DEVELOPMENT.

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Toledo, like many post-industrial cities, has a large distribution of single land-use types, specifically single-family detached residential housing.<sup>xxiii</sup> The supply for this type of housing significantly outpaces demand. Locally, there is appetite for higher-density, mixed-use development in certain areas of Toledo, but underlying zoning makes this type of development difficult without special approvals. Denser development, particularly multifamily buildings, also helps achieve economies of scale for affordable housing development, addressing a structural challenge to leveraging resources like the Low-Income Housing Tax Credit. Making higher-density development an option in more parts of Toledo will make it easier to build in the city.

The City of Toledo is updating its Comprehensive Plan, which is an opportune time to study and identify locations for higher density development throughout the city. Through the plan update process, the Plan Commission, which is leading this update, should study where higher-density development should occur and where it will be most viable, such as areas along public transit lines including areas where it could be used to build a stronger ridership base. This analysis should also examine and update the zoning requirements related to minimum lot sizes, frontages, setbacks, heights, and parking requirements, and any identified updates should enable maximum flexibility. In addition, the update process should identify any impacts and alignment with overarching planning

and development goals, such as opportunities to better align with funding opportunities to finance multifamily development more consistently if the regulatory environment was changed.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Staff capacity to conduct zoning analysis and draft amendments.
  - **Community-based:** Community engagement through the Comprehensive Plan update
- **Collaboration:** Build cross-departmental collaboration in analyzing appropriate densities and locations to address needs; work with the development community to address challenges in using the new zone.
- **Equity:** Provides increased opportunities to achieve affordable housing economies of scale to support new units for Black households.

**STRATEGY 1.2. EXPAND BY-RIGHT ZONING FOR MISSING MIDDLE HOUSING TYPES.**

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Most land in Toledo is zoned for low density and single-family homes, which limits access to schools, shops, and services. This zoning is also out-of-step with current demographic trends, which suggest the need for a wider range of housing options to help attract and retain Toledoans throughout their lives.<sup>xxiv</sup> This strategy will expand by-right zoning, or zoning that does not require special approvals, to missing middle housing types,<sup>xxv</sup> which will allow the option to build a wider range of homes to serve a greater number of residents. In addition, this will support families who live in or want to live in Toledo but cannot find appropriate housing that meets their family's needs.

The upcoming comprehensive plan update provides an opportunity to study and identify where missing middle housing types will be most successful in the city. Through this process, appropriate housing types should be studied and classified as missing middle housing, then geographically identified as to where these types could occur and aligned with goals from this strategy and other planning efforts, such as neighborhood master plans.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Staff capacity to conduct zoning analysis and draft amendments.
  - **Community-based:** Community engagement through the comprehensive plan update process.
- **Collaboration:** Build cross-departmental collaboration in analyzing appropriate housing types to address needs; work with the development community to address challenges in using the new zone.
- **Equity:** Provides increased opportunities for home ownership among Black Toledoans by creating diversity in housing stock.

**STRATEGY 1.3. DEVELOP BY-RIGHT ZONING FOR INFILL DEVELOPMENT.**

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Toledo has a history of chronic disinvestment in its urban core, which has contributed to vacancy and vacant lots resulting from demolition, creating a patchwork of vacant lots through some neighborhoods.<sup>xxvi</sup> Infill development, along with other tactics in use such as side lots and urban gardens, can add new homes to neighborhoods and reconnect these areas. This strategy will update the City of Toledo's zoning standards to allow infill development by right. This strategy will both diversify the City of Toledo's housing supply through the integration of new single-family homes; accessory dwelling units; or small multifamily buildings in neighborhoods with vacant or underused land. By-right zoning of these housing types may also assist with the development of new smaller-scale options.

This strategy can be implemented through piloting of incremental standards that support infill development.<sup>xxvii</sup> This can occur in two simultaneous phases, first by creating a set of interim steps that roll back barriers for infill development in specific areas of the city to help facilitate housing goals. pursuing zoning changes that enable infill development by-right. Then, by pursuing zoning changes that enable infill development by-right.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Staff capacity to conduct zoning analysis and draft amendments.
  - **Community-based:** Community engagement through the comprehensive plan update process.
- **Collaboration:** Build cross-departmental collaboration in analyzing appropriate infill housing types to address needs; work with the development community and partner organizations to address challenges in using the new zone.
- **Equity:** Provides increased opportunities for home ownership among Black Toledoans by creating diversity in housing stock.

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**STRATEGY 1.4. AMEND ZONING STANDARDS TO SUPPORT GROUP LIVING FACILITIES.**

This strategy promotes group living facilities by creating more supportive zoning regulations. Typically, zoning regulations tend to be restrictive of group living facilities, such as group homes, permanent supportive housing, and recovery housing, despite the existence of fair housing laws that are intended to protect these special groups. The history of exclusionary zoning policies in housing in Toledo and the broader country has facilitated these restrictions.<sup>xxviii</sup> In addition, group living facilities typically require additional special permits and approvals, including public comment and notification periods, which opens the door for opposition to these types of projects.

To address these barriers, the City of Toledo should adopt amendments to its zoning code to expand siting opportunities, redefine the different types of housing under the group living use category so they are not based on particular types of disabilities, and differentiate between residential treatment facilities and other types of family/group homes. Revising the definitions and standards for “group living facilities,” can create more housing options and increased housing diversity in Toledo, for groups that need additional housing features or service supports.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Staff capacity needed to conduct the review and make amendments.
  - **Community-based:** Community engagement through the comprehensive plan update process and direct outreach.
- **Collaboration:** Collaboration with multiple departments to ensure feasibility in the permitting process.
- **Equity:** Creates increased housing options for Black Toledoans.

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**STRATEGY 1.5. INCREASE NEIGHBORHOOD PLANNING.**

Neighborhood planning is a critical way to incorporate a community’s desires into the policies and practices that shape public, private, and philanthropic decisions, including what development and other investments occur, over time. It is also a way to create stronger connections between land use and community vision, while building capacity and neighborhood leaders to champion their vision. In Toledo, small area or neighborhood plans are

approved as amendments to the comprehensive plan, often without a path to implementing the community vision outlined within them. Having a clear path to implement these visions both strengthens neighborhoods and builds trust between city staff, residents, and elected officials among others.

An overlay zone is a strategy that could assist in implementation of neighborhood plans; it would create a zoning district that can be applied over the underlying zoning. A neighborhood overlay should include additional standards and criteria for properties that fall within it, which support the neighborhood vision and provide additional opportunities for community input. When zoning overlays are used with neighborhood plans, they can protect special aspects of a neighborhood such as housing types, environmental features, specific development projects, or affordable housing. Similarly, special use or cultural districts can also accomplish the same goals by establishing criteria to preserve or enhance key elements within a designated district. Overlay zones can also serve as precursors to future rezonings and provide an opportunity to test the zoning at a smaller scale.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Staff capacity needed to develop the overlay or district area and associated plan updates and amendments.
  - **Community-based:** Community engagement through the comprehensive plan update process and direct outreach.
- **Collaboration:** Collaboration with multiple departments and neighborhood outreach.
- **Equity:** Creates opportunities for increased neighborhood investment for Black Toledoans.

**STRATEGY 1.6. CREATE NEW TOOLS TO LOWER DEVELOPMENT COSTS.**

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Market conditions and construction costs in Toledo create a financing gap for market-rate development, in addition to the financing gap that typically exists for affordable housing development. The City of Toledo can help increase the feasibility of more development by lowering costs associated with the development process—but it’s important to note that without additional subsidy, these tools alone will not be sufficient to close the entire financing gap.<sup>xxix</sup>

The City of Toledo should explore and then establish a set of tools, such as fee reductions or waivers, regulatory relief, such as reduced or waived parking requirements, and streamlined permitting for qualifying projects (as defined by local housing or land use policy). These tools could be used to support all development or more specific projects, such as those that include affordable units, specific types of housing, and projects in historically redlined neighborhoods. Any tools created to lower development costs will need to be developed with outreach to developers and other stakeholders to determine feasibility and potential for success.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Staff capacity to conduct outreach to developers and analyze current processes to incorporate new tools.
  - **Community-based:** Outreach to residents and other stakeholders to determine potential tools.
- **Collaboration:** Collaboration with multiple partners, the development community, and neighborhood outreach.
- **Equity:** Creates opportunities for increased neighborhood investment for Black Toledoans.

## STRATEGY 1.7. INCREASE TRANSPARENCY & PREDICTABILITY OF DEVELOPMENT DECISIONS.

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This strategy would create more predictability and transparency in development decisions in Toledo through increased outreach and education; ongoing engagement of residents as part of established planning processes; and online application systems and information-sharing. By increasing predictability, costs associated with the risk are lowered, particularly for smaller developers or developers of color without the close relationships in City government and resources to move through the regulatory process.

A mismatch between current zoning and demand for denser development patterns (including more and larger multifamily developments and smaller infill projects) create a consistent need for rezonings or variances.<sup>xxx</sup> This delay and additional step in the development process causes unpredictability. At the same time, lack of communication and collaboration between the Toledo development community and local government was a common theme highlighted in stakeholder outreach conducted during the process to develop this comprehensive housing strategy.<sup>xxxi</sup> And despite being directly affected by land use and zoning decisions, residents are not aware of decisions until shovels hit the ground.<sup>xxxii</sup>

Implementation will involve attending regular meetings of developers and building industry professionals to share information and discuss local policies; these meetings provide an opportunity for City of Toledo staff to engage developers where they are and update them on local policies that directly impact their work. Another way to avoid late-stage engagement is to involve residents around land use and zoning early and often through vision plans, strategies and city and neighborhood-scale master plans. Engaging local community representatives and building local champions proactively can decrease planning fatigue and improve the diversity of viewpoints in land use decision-making.

### [Side bar content]

#### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Staff capacity to initiate outreach and update and/or create new materials on the regulatory process and initiate improvements to existing processes.
  - **Community-based:** Involvement in outreach and communication with City staff to determine inequities within the process increased participation in land-use decisions.
- **Collaboration:** Collaboration within the City and various departments involved in development review and well as with the development community and neighborhood residents.
- **Equity:** More consistent expectations and guidelines to enable stronger engagement of historically underrepresented groups in development and development decisions.

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## STRATEGY AREA #2. HOUSING POLICIES AND PROGRAMS

### WHAT IS THIS STRATEGY AREA?

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Having policies and programs that align with one another and local needs and opportunities is another key part of creating and leveraging a supportive enabling environment for the City of Toledo and its partners to achieve their individual and collective housing goals and projects. The City of Toledo's existing housing programs and policies largely operate independently from one other, which has created inconsistent housing, economic development, and land use outcomes. Part of this inconsistency stems from existing policies, such as tenant protections, that lack the resources and staff to implement them as envisioned or create unspoken expectations about union labor in projects that currently are not subject to project labor agreements under the City's current policy.

The City of Toledo has made strides to streamline its core housing programs, making improvements to its Home At Last, Lead Paint Remediation, and Home Rescue programs, and as a result, saw an uptick in use and qualified contractors to assist with this work. This strategy area aims to build on that success by continuing to strengthen



existing programs, as well as build synergy with decisions related to land use, land assembly and reuse of vacant property, and economic development incentives, to create a more consistent enabling environment.

Strategies related to housing programs and policy on the following pages will support three key changes over the next 10 years:

- **Cohesiveness across the City of Toledo’s housing, economic and land use decisions** through the creation of a guiding policy framework across key plans and processes.
- **Increased use of existing resources across local housing programs** through stronger partnerships and more collaboration in how and where they are used in Toledo.
- **Development of new policies and programs to support housing and economic mobility initiatives** to address gaps or better-serve existing and future needs among Toledo residents.

### **STRATEGY 2.1. ADOPT A COHESIVE HOUSING, ECONOMIC DEVELOPMENT & LAND USE POLICY FRAMEWORK.**

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This strategy will create a guiding framework for the City of Toledo to build synergy between housing, economic development, and land use policy decisions. Today, this framework does not exist. Without clear priorities around specific types of development (particularly infill and larger multifamily buildings and land assemblage), stakeholders shared experiences navigating inconsistent development approval processes, and in some cases, community-level opposition to new development. At the same time, some of the City of Toledo’s resources are working cross-purpose, with instances of tax increment financing and tax abatements via pre-1994 Community Reinvestment Area (CRA) in Downtown Toledo and use of union labor and subsequent requests for the City’s federal funding to offset higher project costs as two examples identified through the CHS process. This strategy should also analyze opportunities to assemble land, particularly vacant land, in strategic neighborhoods.<sup>xxxiii</sup>

This strategy will be implemented by developing and adopting a series of guiding plans—this comprehensive housing strategy; Toledo’s Five-Year Consolidated Plan; Toledo’s Comprehensive Plan; Comprehensive Economic Development Strategy (CEDS)—that advance an overarching vision and goals. Stakeholders shared the need to bring several planning efforts together over the next 1–2 years: Department of Neighborhoods; Plan Commission; Department of Building Inspections; and Department of Economic Development. To aid in implementation of this strategy, departmental leaders should participate in the process to develop these documents when possible, offer specific ideas to make these connections, and convene a cross-departmental workgroup to move their respective strategies forward. For planning efforts that are more regional (and as a result, sit outside the City of Toledo), such as CEDS or TARTA’s Strategic Plan (completed in 2021), department leaders can collectively engage those agencies to help build these synergies.

#### **[Side bar content]**

#### **CROSS-CUTTING FACTORS**

- **Capacity:**
  - **Institutional:** Organizational capacity to convene and facilitate cross-departmental discussion on housing policy framework
  - **Community-based:** Knowledge of upcoming community engagement efforts around upcoming planning documents that shape their community.
- **Collaboration:** Cross-sector collaboration between City leadership and department leaders
- **Equity:** Provide a common equity lens across multiple planning efforts.

### **STRATEGY 2.2. CREATE A LOCAL, DEDICATED SOURCE FOR HOUSING ACTIVITIES.**

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This strategy creates a local, dedicated source of funding to support housing activities that could leverage existing funding sources or fund new housing and community development initiatives. This resource will be critical to

accelerate the City of Toledo’s use of the Low-Income Housing Tax Credit, as well as provide a more flexible funding source for a wider range of housing activities (acquisition; significant rehabilitation and repairs; direct services; infrastructure improvements, to name a few).<sup>xxxiv</sup> The City of Toledo currently relies on federal resources (primarily HOME and CDBG) to directly support most of its housing activities, which has resulted in limits on what can be funded and who can be served.

The key to implementation of this strategy is identification and approval of a dedicated source of funding. Common dedicated revenue sources include a property tax levy; percentage of real estate transfer tax or document recording fee revenues; developer fees; or general fund revenue. Franklin County created their local dedicated source for housing through a \$1 increase in real estate conveyance fees for a 10-year period. This is estimated to generate \$6-\$7 million annually and is being used to renovate or build 2,050 units affordable to low- and moderate-income households.<sup>xxxv</sup>

**[Side bar content]**

**CROSS-CUTTING FACTORS**

- **Capacity:**
  - **Institutional:** City staff capacity to evaluate, create and administer a new local funding source.
  - **Community-based:** Involvement and engagement with residents around the referendum and voice around the design of key usage for funds.
- **Collaboration:** Create closer alignment and use of existing and new resources.
- **Equity:** Opportunity to invest in housing activities that address racial disparities on a people, housing, and neighborhood level.

**STRATEGY 2.3. IMPROVE DELIVERY AND EFFECTIVENESS OF EXISTING PUBLIC AND NONPROFIT PROGRAMS.**

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This strategy will improve the delivery and effectiveness of Toledo’s public and nonprofit programs across Toledo through a closely coordinated delivery process across the Department of Neighborhoods and key housing partners, many of which administer public funding and offer programs that supplement or complement the City of Toledo’s housing programs. At times, local housing partners are competing for the same resources from the City of Toledo, with limited coordination on use, despite often operating in the same geographic footprint. Within city government, there are opportunities to deliver services more proactively and strategically. One area for the City of Toledo to improve service delivery is code enforcement, which would directly draw on the strategies highlighted in 2021 assessment by the Center for Community Progress to take a more strategic and equitable approach.<sup>xxxvi</sup>

Part of implementation will include working with partners to identify opportunities to de-duplicate efforts; align existing programs; and reduce the burden on Toledo residents when applying for or using public and nonprofit partners’ programs. Tactics to reduce barriers include establishing community resource navigator positions at local nonprofits and developing a common intake form that can assess eligibility for both public and nonprofit programs.<sup>xxxvii</sup> The City of Toledo can use its public information staff to develop marketing materials in different languages and mediums.

**[Side bar content]**

**CROSS-CUTTING FACTORS**

- **Capacity:**
  - **Institutional:** Training development and delivery
  - **Community-based:** Knowledge of existing public and non-profit housing programs
- **Collaboration:** Building-out a common application and intake process
- **Equity:** Increase access to housing resources among low-income households

## STRATEGY 2.4. EXPAND COMMUNITY REVITALIZATION AREAS.

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The City of Toledo's Community Revitalization Area (CRA) provides a tax exemption in specific parts of Toledo; this tool lowers the costs associated with overall development, making it a way to help spur both market-rate and affordable homes in the city. There are two types of CRAs: 1) Pre-1994 CRAs, where the tax exemption largely applies to all eligible projects; and 2) post-1994 CRAs, where projects are evaluated relative to each CRA's requirements and the City of Toledo can set criteria around their use.<sup>xxxviii</sup> A recent program evaluation conducted for the Department of Economic Development found that Toledo's CRA program is underused due to lack of awareness.<sup>xxxix</sup> At the same time, post-1994 CRAs do not incorporate housing goals, such as housing type or unit size or affordability, in them, missing an opportunity to leverage this tax incentive to further the City of Toledo's housing goals.

The implementation of this strategy involves three main components:

1. Creation of new post-1994 CRAs with housing goals into more parts of Toledo, mostly in south and west Toledo given where CRAs already exist today, in tandem with a small-area needs study to support its use.
2. Assessment of existing post-1994 CRAs for opportunities to amend their legislation to incorporate housing goals into them.
3. Creation of a network to increase use of this tax incentive through increased staff collaboration across the Departments of Neighborhood and Economic Development; engagement of key program partners, such as developers and financial institutions; and development of summary materials (in tandem with other programs) for outreach.

The integration of housing goals into both new and existing post-1994 CRAs would help align the City of Toledo's housing goals (as outlined in this comprehensive housing strategy; Toledo's forthcoming Comprehensive Plan; neighborhood master plans; and partners' strategic plans) with one of the City's main tools to lower development costs today (see "Create new tools to lower development costs" for the creation of new tools).<sup>xl</sup> These goals—for instance, housing type, unit mix, affordability levels, and tenure—can be tailored to specific neighborhood needs and aspirations.

### [Side bar content]

#### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** City staff coordination in the design and implementation on expanded CRA program.
  - **Community-based:** Build the awareness of CRA program (i.e., target engagement).
- **Collaboration:** Create closer alignment of housing and economic development tools.
- **Equity:** An opportunity to target investment in historically redlined communities, that are primarily communities of color.

## STRATEGY 2.5. ESTABLISH A REDEVELOPMENT AUTHORITY (RDA) TO FACILITATE PROPERTY REUSE AND DEVELOPMENT.

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This strategy creates a city-chartered Redevelopment Authority (RDA) to act as the City of Toledo's development arm and facilitate redevelopment of large-scale preservation and redevelopment projects, including the reuse of Toledo's growing number of vacant and city-owned properties.<sup>xli</sup> This authority would have a separate Board of Directors and capital to "move the market" in parts of Toledo that need additional mission-driven support, with a focus on the City of Toledo's three Neighborhood Revitalization Strategy Areas (NRSA). The creation of a city-chartered RDA would enable the City of Toledo to seek additional funding not directly available to local governments and quickly ramp up local capacity for implementation of more housing activities, as more incremental capacity-building occurs over time (see "Build capacity at community-based organizations" and "Build capacity among institutional partners").

Implementation of this strategy requires determining and developing the structure of the RDA, which should be done in close collaboration with the Toledo City Attorney's Office, and resourcing its early implementation, which is one potential use of the City of Toledo's American Rescue Plan dollars. The Mayor's Office, in partnership with community-based organizations, leaders, and residents, should shape the mission and goals of the city's RDA; its key functions; and representation on the RDA's board. This work should inform legislation to Toledo City Council to create an RDA for the City of Toledo.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** City staff organizational capacity to administer RDA.
  - **Community-based:** Ability to have a neighborhood organization to voice in the property reuse outcomes.
- **Collaboration:** Common agreement across city departments and residents of reuse and development of residential properties.
- **Equity:** An opportunity to redevelop and revision vacant properties in communities of color.

**STRATEGY 2.6. CREATE A RENTAL REGISTRY FOR HOUSING HEALTH AND SAFETY STANDARDS.**

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This strategy will create a local rental registry for the City of Toledo to ensure all rental homes in Toledo meet basic health and safety standards, such as sanitation and structural safety.<sup>xlii</sup> Renting, especially in Toledo's core neighborhoods with concentrations of both older homes that pose health hazards and Black households, is becoming more common. However, Toledo Code Enforcement staff cannot proactively inspect rental homes today to ensure they meet a minimum standard for livability.

Implementation of this strategy would involve establishing a rental registry through legislation adopted by Toledo City Council and aligning administrative resources, including staffing and existing home repair resources, to assist with its implementation over time. Toledo's policy should outline the key design considerations for this registry, including specific health and safety standards to meet; the process for inspections and registration; and an enforcement and resolution structure (including any registration fees and fines for noncompliance). The Department of Neighborhoods will also need to assess its ability to staff this effort, including identifying additional staffing needs or contract labor to assist with implementation.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** City staff organizational and administrative capacity to lead the program. This includes training and development of staff.
  - **Community-based:** Shared knowledge of tenant rights and intervention options.
- **Collaboration:** During the program design process, develop a community agreement on health and safety standards for renters.
- **Equity:** Create safe and health rental homes in communities of color.

**STRATEGY 2.7. INCREASE TENANT PROTECTIONS ENFORCEMENT AND RESOLUTION INFRASTRUCTURE.**

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This strategy will create a tenant liaison position at the City of Toledo, along with stronger education and outreach to tenants and landlords and collaboration among them to resolve disputes, to support effective implementation of the City of Toledo's existing tenant protections. These protections include Toledo's Pay to Stay ordinance and local fair housing protections, including source of income protection. While these protections exist and the Fair Housing Center assists residents with fair housing complaints, the City of Toledo does not have an internal

structure in place to field and resolve tenant-landlord issues and deliver comprehensive landlord and tenant education about local tenant protections. Having this type of infrastructure would especially benefit housing insecure renters in Toledo, especially Black, single-parent, and senior households that have higher rates of housing insecurity relative to the average household.

This strategy would create a tenant liaison position in the Department of Neighborhoods to provide a resource for tenants and landlords in need of assistance. This position would serve several different functions: conducting education and outreach about the City of Toledo’s tenants’ rights and landlords’ responsibilities under the City’s current laws (see “Conduct outreach to landlords and tenants about Toledo’s source of income policy”); sharing information to existing resources for renters and rental property owners; working with the Toledo Municipal Court and legal service organizations to assist with eviction prevention; and tracking tenants’ needs to inform changes to the City of Toledo’s existing tenant protection policies or enforcement processes.

**[Side bar content]**

**CROSS-CUTTING FACTORS**

- **Capacity:**
  - **Institutional:** City staff training development, staffing and delivery of information.
  - **Community-based:** Shared knowledge of rights and reporting and enforcement options.
- **Collaboration:** An ongoing dialogue between the city, landlords and tenants.
- **Equity:** Commitment to provide tenant protection and rights to Black Toledoans and senior renters facing housing insecurity.

**STRATEGY 2.8. EXPAND EXISTING TENANT PROTECTIONS.**

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This strategy will increase tenant protections for renters in the City of Toledo to address the prevalence of evictions and lower barriers to housing among justice-involved people. Toledo has the third highest eviction rate in Ohio; has more households facing eviction due to the impact of COVID-19; and has more evictions in communities of color.<sup>xliii</sup> At the same time, a power imbalance exists between landlords and tenants in eviction court, which perpetuates inequities related to who is affected by the immediate and long-term impacts of an eviction: displacement; homelessness; being denied future housing opportunities; and limited availability of other housing options. Toledo’s *Analysis of Impediments to Fair Housing Choice* found that both households with past evictions and persons affected by the criminal justice system are disproportionately affected by substandard housing conditions, because they are screened out or otherwise do not qualify for rental homes.<sup>xliv</sup>

The implementation of this strategy involves legislation by Toledo City Council to expand tenant protections to include sealing or expunging eviction records after a set period of time, such as 3 years, and providing tenants the right to legal counsel via subsidized legal assistance in eviction court. To serve justice-involved households, it also involves adopting a fair chance housing policy, which typically limits the use of criminal records by housing providers and landlords when they are screening prospective tenants. However, the specific policy goals and provisions should be developed closely with those most impacted locally.<sup>xlv</sup>

It also involves resourcing these policies (subsidized legal assistance provided through a right-to-counsel provision and support for needs or services identified through a fair chance policy) and ongoing education and outreach to tenants and landlords on these new protections, along with available anti-evictions and re-entry resources (which can occur in tandem with other outreach efforts around fair housing; source of income protections; and general tenants’ rights; see “Increase tenant protections enforcement and resolution infrastructure”).

**[Side bar content]**

**CROSS-CUTTING FACTORS**

- **Capacity:**

- **Institutional:** City staff’s organizational and administrative capacity to led need tenant protection efforts and policy design process.
- **Community-based:** Knowledge of rights and voice in additional tenant protections
- **Collaboration:** Build cross-sector commitment to address systemic disparities
- **Equity:** Increase access to housing options among low-income renters and communities of color

## STRATEGY 2.9. DEVELOP A POLICY TO GUIDE UNION LABOR REQUIREMENTS IN RESIDENTIAL DEVELOPMENT.

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This strategy will create a policy to guide use of union labor for projects not subject to Toledo’s current project labor agreement (PLA) policy (i.e., not a City bid). Union jobs are an important part of the workforce in the City of Toledo, providing opportunities for Toledo residents to benefit from development occurring in the city, along with the broader benefits union labor provides in the form of enhanced safety measures, higher wages (relative to nonunionized counterparts), and ability to close economic disparities among Black and Hispanic unionized workers.<sup>xlvi</sup> Supporting union jobs and achieving housing affordability should not be at odds. But, without an explicit policy that guides use of union labor outside of City bids, recent projects seeking City approvals, such as a rezoning, have had to negotiate union labor on a project-by-project basis, resulting in reported delays and higher project costs.<sup>xlvii</sup>

Implementation of this strategy will establish a consistent standard, via local legislation, for when and how to use union labor for residential development occurring in Toledo. Having this standard will fill an unspoken policy goal to use union labor more consistently in development projects. This standard will be developed collaboratively through a taskforce, with representation from City of Toledo departments (Departments of Neighborhoods and Economic Development); local and regional trade organizations; and developers to build agreement on the policy approach. This taskforce will need to address the following policy elements as it builds this framework: applicability (when the project standards will apply and if any developments will be exempted); amount of project labor to use (including if it will vary based on the project type or cost); administration (responsibility for administering and monitoring these standards); and tracking and reporting (how will project labor use be tracked and reported over time).

### [Side bar content]

#### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** The administrative and staff capacity to the development of policy framework and lead the taskforce.
  - **Community-based:** Community engagement around key policy changes that impact residents in union workforce.
- **Collaboration:** Collaboration with building trade unions and developers and the City to ensure consensus around policy changes
- **Equity:** Opportunity to expand new affordable housing development in communities of color.

## STRATEGY 2.10. DEVELOP A PRESERVATION STRATEGY FOR UNSUBSIDIZED AFFORDABLE MULTIFAMILY PROPERTIES.

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This strategy provides Toledo with a guide to preserve unsubsidized affordable multifamily rental properties. These buildings are already somewhat limited (29 percent of Toledo’s rentals), and if lost, could be challenging to replace. Black Toledoans and lower-income households would be affected by the loss of this affordable housing stock, as renting is more common among them. Stakeholders shared a need to invest in this property type, given the ongoing upkeep costs associated with older multifamily properties.



Implementation will involve study of this property type to better understand the capital needs and operating costs among these properties, including creation of an inventory of them (with information such as property size; unit mix; property age; location; and rent levels). Part of this study should engage property owners, building managers, and tenants at these properties to better understand what types of policies, financing, or other assistance would best serve them.

At the same time, the City of Toledo should build a strong policy and financing environment to preserve these properties. This environment can be built through adoption of a right-of-first refusal policy for this property type that enables the City of Toledo or a designee to purchase these properties prior to a sale and building greater awareness of the existing private-sector financing available to support acquisition and renovation of these properties and developing new funding tools to fill any additional gaps (such as a set-aside in the future Toledo-Lucas County Affordable Housing Development Fund created using a dedicated local source of funding).

#### [Side bar content]

#### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Development, delivery, and outreach.
  - **Community-based:** Knowledge of financial tools.
- **Collaboration:** Create closer alignment of tools and ongoing dialogue with local property owners.
- **Equity:** Housing stability for communities of color

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### STRATEGY AREA #3. NEIGHBORHOOD EMPOWERMENT

#### WHAT IS THIS STRATEGY AREA?

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Neighborhood empowerment means that residents living in Toledo’s neighborhoods, especially those that have experienced systemic racism and stigmatization, are at the center of existing, expanded, or new housing programs, policies, and investments. Many stakeholders in Toledo shared that over the last decade, neighborhood residents lost their collective voice in local decisions and their ability to guide direct investments in their communities, as community development corporations shuttered. While housing activities continue in Toledo neighborhoods, they are led by outsiders and local government, with a few notable exceptions. Neighborhood empowerment means this orientation will change over the next 10 years, with residents speaking and advocating for themselves and leading more efforts.

Neighborhood empowerment can also be an antidote to neighborhood inequity. Local decisionmakers and stakeholders elevated this inequity as one of the most pressing housing needs in Toledo. Today, Black Toledoans experience higher rates of housing instability and lower homeownership rates than the average Toledo household.<sup>xlviii</sup> Hispanic households tend to live in neighborhoods with higher rates of poverty.<sup>xlix</sup> Many households’ needs extend beyond their home and in some parts of Toledo, affect entire neighborhoods in the forms of high shares of vacant and tax delinquent properties; gaps in education and employment levels; and limited access to destinations such as job centers or amenities such as green space.<sup>1</sup>

Strategies related to neighborhood empowerment on the following pages speak to three key changes over the next 10 years:

- **More capacity at community-based organizations** by building skills among Toledoans to guide neighborhood improvements and represent their interests.
- **More representation in housing activities** by directly creating opportunities for Toledoans to benefit from the investments occurring in their neighborhoods.
- **Fewer equity gaps in housing outcomes** by focusing investments in homes and households in ways that close racial disparities in housing instability and homeownership rates.

### STRATEGY 3.1. INCREASE HOMEOWNER ASSISTANCE IN HISTORICALLY REDLINED COMMUNITIES.

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This strategy will increase use of public and private homeownership resources in historically redlined neighborhoods in Toledo to address long-standing housing discrimination and create opportunities for material gains among Toledoans. Black households in Toledo, particularly those living in Toledo’s urban core, continue to live with the legacy of systematic marginalization from the city’s housing market; these areas largely overlap with red and yellow areas rated as “hazardous” or “definitely declining,” respectively, by the federal Homeowner’s Loan Corporation in the late 1930s.<sup>ii</sup>

This strategy will be implemented through a mix of changes to existing homebuyer assistance programs (prioritize use of homeowner assistance in historically redlined areas; increase amount of available assistance in them; increase flexibility of their use; and capacity-building to enable residents to directly assist with implementation) and the creation of new homeownership products by private financial institutions that increase access to mortgage financing for households living in these areas. A central component of implementation will be a cross-sector commitment across City of Toledo, private financial institutions, nonprofits, and philanthropic organizations, to use a majority of their homeownership assistance programs (including services such as homeownership and financial counseling), in historically redlined communities each year and consistently track and publicly report on their progress at least annually. This includes the Year 16 Initiative, where implementation of this strategy should align rental to homeownership opportunities in historically redlined neighborhoods when possible.

#### [Side bar content]

##### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Relationship-building with community residents
  - **Community-based:** Organizational capacity to support program delivery
- **Collaboration:** Build cross-sector commitment to use resources to address systemic disparities
- **Equity:** Lessen the racial wealth gap among Black Toledoans

### STRATEGY 3.2. BUILD CAPACITY AT COMMUNITY-BASED ORGANIZATIONS.

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This strategy will increase neighborhoods’ ability to achieve their goals independently and collaboratively with institutional partners. Many local stakeholders shared the loss of capacity for place-based development and neighborhood-driven decision making as Toledo lost community development corporations over the last decade.<sup>iii</sup> The remaining community-based organizations have a critical role to play in guiding place-based efforts and more need to be cultivated, but need long-term support (financial assistance for activities; financial assistance for operations; technical assistance for leadership and organizational development) to be successful.<sup>iiii</sup>

Implementation will involve additional assessment of community capacity; provision of cross-sector, sustained support for existing and emerging community-based organizations; and alignment of housing activities with capacity-building (for instance, building stronger networks or transfer knowledge through programs or projects).

#### [Side bar content]

##### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Relationship-building with community residents; cultural relevance
  - **Community-based:** Organizational capacity to support program delivery
- **Collaboration:** Direct support for sustained community-led efforts
- **Equity:** Increase representation among households of color and low-income households in local decision making



### STRATEGY 3.3. COMPLETE COMPREHENSIVE BLIGHT REMOVAL IN TOLEDO NEIGHBORHOODS.

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This strategy will coordinate and concentrate blight removal activities across the City of Toledo, Lucas County Land Bank, and nonprofits in Toledo neighborhoods to help address the harmful effects of blight.<sup>iv</sup> According to the Toledo Survey Project, the City of Toledo has 865 hazardous homes, with most of these properties concentrated in the neighborhoods that border downtown Toledo, which overlaps with other needs, such as high concentrations of housing instability and poverty, among Black and Hispanic households.<sup>iv</sup> This concentration necessitates a coordinated blight removal effort that includes critical repairs of occupied homes; rehabilitation and resale of vacant homes; abatement of lead hazards; and targeted demolition.

This strategy will be implemented through stronger alignment and use of the blight removal tools available in Toledo (including code enforcement, the City's Home Rescue Program; side lot program; tax foreclosure; and vacant property demolition) and resident-led efforts to address blight and hazardous homes across an entire neighborhood. This level of coordination will require common decision-making tools that can guide how and where to use the city's blight removal tools. The City of Toledo should lead the creation of these tools: establishing the data metrics and centralized system to track vacant property and code violations and setting up a coordination structure (blight action committee). As more tools are created to support neighborhood reinvestment and revitalization, they should be incorporated into implementation.

#### [Side bar content]

##### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Data infrastructure and tracking; coordination of resources
  - **Community-based:** Organizational capacity for development and implementation of blight reduction plans
- **Collaboration:** Create closer alignment and use of existing and new resources
- **Equity:**
  - Lessen exposure and presence of hazardous homes in communities of color
  - Increase representation among households of color and low-income households in local decision-making

### STRATEGY 3.4. ESTABLISH COMMUNITY OWNERSHIP MODELS.

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This strategy would create more community-serving homes through a community land trust. Community-ownership models, such as community land trusts and cooperatives, create alternatives to traditional property ownership models.<sup>vi</sup> They are designed to provide community benefits, such as access to homeownership for low- and moderate-income households; increase residents' participation in local development decisions; and limit land speculation. Toledo has an untapped asset in its existing vacant property (15 percent of all homes as of 2018), and community leaders in Toledo have a desire to see more of those properties rehabilitated or rebuilt in ways that directly benefit neighborhood residents.

This strategy will work to provide the resources, technical assistance, and property to establish a community land trust in Toledo and increase the use of housing cooperatives as new affordable homes come online over the next 10 years. The City of Toledo and Lucas County Landbank can help get these models off the ground by providing start-up funding, sponsoring technical assistance, and assembling and donating land and property to be part of a land trust.

#### [Side bar content]

##### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Providing technical assistance and financial support

- **Community-based:** Organizing; ability to stand-up an organizational structure; project management; housing development
- **Collaboration:** Direct support for sustained community-led efforts
- **Equity:**
  - Lessen the racial wealth gap among Black Toledoans
  - Increase representation among households of color and low-income households in local decision-making

### **STRATEGY 3.5. CONNECT REDEVELOPMENT PROJECTS AND WORKFORCE DEVELOPMENT INITIATIVES.**

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This strategy will better-integrate employment and workforce opportunities with residential and mixed-use development and redevelopment projects. Development and redevelopment projects present an opportunity to link Toledo residents, many of whom need jobs and want to assist with housing and community development activities, with jobs in construction and related trades.<sup>lvii</sup> This strategy is especially important in supporting Black Toledoans, whose unemployment rate and household income lag citywide levels.<sup>lviii</sup>

Implementation of this strategy will involve creating policies, such as community benefits agreements that promote local hiring; increasing use of training opportunities into City of Toledo programs (building on the existing partnership between the City Toledo and Toledo Public Schools that support youth-led construction opportunities); and forging stronger partnerships with local labor unions and community-based organizations.

**[Side bar content]**

**CROSS-CUTTING FACTORS**

- **Capacity:**
  - **Institutional:** Creation of policies to guide linkages; tracking progress
  - **Community-based:** Organizational capacity to engage in creation of opportunities
- **Collaboration:** Build cross-sector commitment to use resources to address systemic disparities
- **Equity:**
  - Lessen the racial wealth gap among Black Toledoans
  - Increase power and autonomy among households of color and low-income households

### **STRATEGY 3.6. INVEST IN QUALITY-OF-LIFE IMPROVEMENTS IN TANDEM WITH HOUSING INVESTMENTS.**

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This strategy will create a stronger link between neighborhood-level housing investments and other investments that improve quality of life for Toledo residents. This strategy will both address the some neighborhoods’ need for more comprehensive community development to address decades of decline and systemic disinvestment and serve as a way to attract residents to Toledo over time.

Implementation of this strategy will involve using existing resources (capital improvement budget; Community Development Block Grant; MetroParks bond); forging stronger partnerships with employers and Toledo Public Schools; and leveraging tools, such as Section 108 Loan Guarantee Funds to undertake quality-of-life improvements in neighborhoods where housing investments are occurring. A central component of this strategy will be to better align ongoing decision-making about use of public resources with housing investments, as well as find ways to scale existing community-based efforts.

**[Side bar content]**

**CROSS-CUTTING FACTORS**

- **Capacity:**
  - **Institutional:** Outreach; marketing; racial equity tools for decision-making
  - **Community-based:** Outreach; marketing; project management
- **Collaboration:** Create closer alignment and use of existing and new resources
- **Equity:** Increase cross-sector investment in historically marginalized neighborhoods

### STRATEGY 3.7. INCREASE FAIR HOUSING EDUCATION.

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This strategy aims to educate tenants, homebuyers, landlords, property managers, and real-estate professionals about their respective rights and obligations under federal, state, and local fair housing laws. Fair housing education continues to be a central part of the City of Toledo’s goals to address housing discrimination, according to the *City of Toledo Analysis of Impediments to Fair Housing Choice*.

Specifically, increased education and outreach efforts should be designed to reach landlords, as rental complaints represent the largest category of complaints received by The Fair Housing Center.<sup>lix</sup> More information needs to be shared about discrimination based on disability and race, given these are the main forms of discrimination reported in the City of Toledo over the last several years. Additionally, more outreach may be needed among Hispanic households, as they represent a small share of those reporting housing discrimination but make up a growing share of Toledo residents.<sup>lx</sup>

Implementation of this strategy will involve a combination of complementary actions that produce educational materials (with special attention to language, format, and messenger); conduct outreach to tenants directly and through community-based organizations with ties to affected populations; develop and deliver trainings to rental property owners, landlords, and real-estate professionals; and seek resources that can be used to build the capacity for fair housing education at nonprofit organizations.

#### [Side bar content]

#### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Training development and delivery; relationship-building with affected groups
  - **Community-based:** Knowledge of rights and reporting and enforcement options
- **Collaboration:** Cross-sector ability to undertake culturally relevant community engagement
- **Equity:**
  - Lessen housing discrimination among legally protected classes

### STRATEGY 3.8. CONDUCT ONGOING PUBLIC OUTREACH ABOUT HOUSING NEEDS AND AVAILABLE RESOURCES.

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This strategy facilitates a consistent, productive two-way dialogue between institutional housing partners working in Toledo neighborhoods (Maumee Valley Habitat for Humanity; NeighborWorks Toledo; and LISC Toledo, to name some) and community partners who are closest to their communities’ respective needs and strengths. When one community leader spoke about neighborhood empowerment and capacity, she spoke about trust, saying engagement needs to go deeper than community leaders. Some community partners feel their neighborhoods are not receiving cultural relevant services or feel stigmatized when receiving services; others reported a lack of awareness of available opportunities, including resources.

This strategy increases the frequency and quality of public outreach and engagement by institutional partners working Toledo neighborhoods, in tandem with strategies that build community partners’ capacity to lead community development activities in their neighborhoods. Implementation could involve community engagement training (including models that hire community members to conduct outreach and ongoing relationship-building); community-based capacity building; creation of a housing advisory board; and communitywide events such as a

quarterly neighborhood summits or forums, co-hosted by institutional and community partners. Ongoing engagement will provide more real-time information about unmet or emerging housing needs or ways to improve service delivery to inform adjustments to programs, policies, and resources administered by institutional partners. It may also highlight opportunities to increase representation of people of color at institutional partners' organizations, through activities like hiring and board recruitment.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Relationship-building with community residents
  - **Community-based:** Ability to play formal roles in decision-making
- **Collaboration:** Cross-sector ability to undertake culturally relevant community engagement
- **Equity:** Increase representation among households of color and low-income households in local decision-making

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**STRATEGY 3.9. LAUNCH A PUBLIC EDUCATION CAMPAIGN ABOUT HOUSING FOR ELECTED LEADERS.**

This strategy will build a common understanding about the importance of housing—including how it affects the lives of Toledoans and its role in supporting broader community goals such as economic development and community belonging and pride—among elected leaders in Toledo over time. This type of campaign is both important to advance short-term implementation of strategies and actions in this comprehensive housing strategy and to ensure as political transitions occur over the next 10 years, there's a way to continue to keep housing on local leaders' agenda.

Public education campaigns typically create a common set of messages and resources that can be used by different groups. This strategy can be implemented through a multi-faceted, collaborative effort, with representation from nonprofits; civic leaders; community arts and cultural institutions; and community leaders and residents to collaborate. These groups can collaborate to develop the key messages and campaign tools (messaging guides; event guides; informational materials, such as fact sheets, infographics, photos, stories, for example) to use to reach existing and future elected leaders.<sup>lxii</sup>

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Communicating for influence
  - **Community-based:** Communicating for influence
- **Collaboration:** Advocacy and engagement on local priorities
- **Equity:** Political commitment to address disparities affecting Toledoans

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**STRATEGY 3.10. CONDUCT OUTREACH TO LANDLORDS AND TENANTS ABOUT TOLEDO'S SOURCE OF INCOME POLICY.**

This strategy will increase awareness and effectiveness of Toledo's source of income policy among landlords and tenants across the city through public education and outreach, training, and peer learning. Passed in December 2020, Toledo City Council extended its fair housing law to include source of income, making it illegal for landlords to discriminate against renters using government assistance, such as federal Housing Choice Vouchers, and to

refuse Housing Quality Standard inspections (which are required to use federal rental assistance). Like many fair housing laws, outreach, education, and enforcement are critical to this policy’s ability to protect renters in Toledo.

This strategy will be implemented through a series of outreach and education actions designed to build a stronger understanding of how this policy looks in practice, including the Housing Quality Standards inspection process; myth-busting about common critiques related to source of income protection policies; and experiences from other communities with long-standing policies. Part of this education and outreach could involve working directly with affected landlords, tenants, and other stakeholders, such as the Fair Housing Center and Lucas Metropolitan Housing, to understand additional resources to support landlords. Additional resources could include financial incentives to landlords for outcomes, such as early participation in the housing inspection process; employing contract inspectors or cross-train housing authority and city inspectors to streamline property inspections; or hiring a landlord liaison to lead outreach efforts. It could be delivered as stand-alone outreach or be part of broader fair housing education and outreach efforts (see “Increase fair housing education.”).

**[Side bar content]**

**CROSS-CUTTING FACTORS**

- **Capacity:**
  - **Institutional:** Training development and delivery; relationship-building with affected groups
  - **Community-based:** Knowledge of rights and reporting and enforcement options
- **Collaboration:** Build cross-sector commitment to address systemic disparities
- **Equity:**
  - Increase access to stable housing among low-income renters
  - Lessen housing discrimination among low-income renters

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## STRATEGY AREA #4. RESOURCES AND CAPITAL

### WHAT IS THIS STRATEGY AREA?

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The housing issues affecting Toledo residents are great—and there are not sufficient resources to available today to meet them. The City of Toledo lacks enough homes for about 13,000 of its households (after accounting for both affordability and availability); local rehabilitation programs cannot cover the depth of housing quality problems; and core housing programs, such as the Low-Income Housing Tax Credit, go largely untapped. This needs to change.

Scaling resources and capital to meet the needs of Toledo’s residents means three things: 1) increasing available resources; 2) diversifying the types of resources available; and 3) making them more flexible so they can be used by more people and for more circumstances. This level of flexibility cannot be achieved through reliance on federal funding programs, which are the primary resources for the City of Toledo’s housing activities today, and nonprofit and private-sector funding that are not always designed to the local market or aligned with community goals.

Effective resources and capital—the right types, at the scale of the challenges being addressed—also require stronger alignment and partnerships across the City of Toledo. This makes it possible for City departments and institutional partners to better use the resources already available to them and gives residents more power over their housing situations and lives.

Strategies related to resources and capital on the following pages speak to three key changes over the next 10 years:

- **Creation of new and more flexible resources** to support a wider range of housing activities and programs.
- **Increased competitiveness for new or existing resources** to take advantage of untapped funding already available to the City of Toledo.
- **Stronger engagement of private-sector and philanthropic partners** in local housing activities to maximize the impact of public resources and scale funding to meet more residents' housing needs.

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### STRATEGY 4.1. DEVELOP A PLACE-BASED SOURCE OF FUNDING FOR COMMUNITY REINVESTMENT.

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This strategy will establish a place-based source (or sources) of funding for neighborhoods in need of long-term reinvestment, particularly neighborhoods in Toledo’s core. <sup>lxii</sup> Toledoans living in these neighborhoods face disparities in neighborhood outcomes, including high shares of vacant and tax delinquent properties and gaps in education and employment levels by race. A strong partnership across the public, private, and philanthropic sectors could pool resources to support place-based reinvestment and catalytic projects that provide benefits to existing and future Toledoans, similar to other efforts in places like Detroit and Hamilton, OH.

The City of Toledo should work closely with neighborhood residents and leaders, private-sector partners, civic organizations, and philanthropic organizations to design a funding source that works for the neighborhoods where it will be used. These stakeholders can draw on a range of past neighborhood planning efforts, the City of Toledo’s use of NRSAs, and ongoing place-based initiatives to inform this work and closely align the use of this funding with neighborhoods’ visions and assets and opportunities to directly address the inequities that exist in some Toledo neighborhoods. In terms of funding sources, this source could be a new cross-sector capital pool, including patient capital, and seeded by the City of Toledo; Section 108 Loan Guarantee (aligned with requirements for its use as a federal program); sustained use of public funding in defined neighborhoods over time; or some combination of these sources.

#### [Side bar content]

#### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** The city’s organizational capacity for partnership across entities and relationship-building with community residents.
  - **Community-based:** Neighborhood organization’s capacity support place-based reinvestment and catalytic projects.
- **Collaboration:** Cross-sector funding and strategic targeting of resources on a neighborhood level.
- **Equity:** Ability to address the disparities in neighborhood outcomes and racial inequity.

#### STRATEGY 4.2. CREATE A LEADSAFE IMPLEMENTATION FUND.

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This strategy creates a source of funding to support implementation of the City of Toledo’s Lead Poisoning Prevention Ordinance, which was passed in 2019 by Toledo City Council to protect residents from health hazards posed by lead in older homes, hazards that primarily affect children, low-income, and Black families.<sup>lxiii</sup> This funding would aid in the implementation of this ordinance by supporting both lead testing in rental properties of 1–4 units built before 1978 and in-home childcare facilities units and if needed, financial assistance to address lead hazards to obtain a LeadSafe certificate.

Implementation of this strategy will involve both designing and capitalizing the LeadSafe Implementation Fund, mirroring similar efforts in places like Columbus and Cleveland, OH. In terms of design, Toledo Department of Neighborhoods, working closely with other members of the Toledo Lead Poisoning Prevention Coalition, property owners, and tenants (particularly those in high-risk Census Tracts as defined by the LeadSafe ordinance) should lead the design of this fund. Some aspects of design, namely eligibility (rental properties of 1–4 units built before 1978 and in-home childcare facilities); priority geographies (high-risk census tracts); and core uses (activities to control or abate lead hazards to meet certification requirements) are outlined in the policy itself. A focus of design should be on considerations that still need to be defined:

- Who will administer the LeadSafe Implementation Fund?<sup>lxiv</sup>
- What type of funding will the LeadSafe Implementation Fund provide (grants; low-interest or forgivable loans; universal incentives, such as free lead inspections)?
- Will the LeadSafe Implementation Fund provide financial assistance for additional activities (information systems; education and outreach materials; or administration staff)?
- How will the LeadSafe Implementation Fund be capitalized?

#### [Side bar content]

##### CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Organizational capacity to support fund administration
  - **Community-based:** Ability to shape fund and its use
- **Collaboration:** Build cross-sector commitment to use resources to address health inequities
- **Equity:** Remove health hazards for low-income households and Black households

#### STRATEGY 4.3. DIVERSIFY FUNDING SOURCES TO SUPPORT HOUSING ACTIVITIES.

---

This strategy will expand the types of financing available for housing activities in the City of Toledo and the eligible activities housing these funds can support. Stakeholders elevated this need, coupled with increased capacity for place-based development, as a priority strategy in this strategy area. Specifically, local leaders highlighted a need to be able to support acquisition opportunities more consistently and preservation of rental properties (including smaller ones with two to four units). Having a diversity of local funding sources makes it possible to pursue a balanced portfolio of housing activities and easier to fill financing gaps.

Implementation will occur through a two-pronged approach. One part of implementation will be the development



or attraction of new funding resources to fill gaps or supplement existing funding sources to scale housing activities. Another part of implementation will be increasing awareness and use of the existing funding tools that already exist at local organizations, like those available from LISC Toledo; ProMedica, and Toledo-Lucas County Port Authority.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Knowledge of how to create, manage, and use more funding resources to meet place-based goals
  - **Community-based:** Knowledge of how to use different funding tools to meet place-based goals
- **Collaboration:** Create closer alignment and use of existing and new resources
- **Equity:** Increase cross-sector investment in historically marginalized neighborhoods

**STRATEGY 4.4. INCREASE COMPETITIVENESS FOR STATE HOUSING RESOURCES.**

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This strategy aims to increase affordable housing projects' competitiveness for funding, including the Low-Income Housing Tax Credit (LIHTC), awarded by the Ohio Housing Finance Agency (OHFA). Being competitive for OHFA resources is a key part of being able to address the City of Toledo's limited supply of homes for extremely low-income households, about half of whom are forced to live in higher cost housing and face housing instability.<sup>lxv</sup> However, over the last five years, Toledo has received only a small number of awards to finance subsidized development from OHFA. Mismatch between local and state place-based priorities; intracity competition; and limited development capacity and perceived political support are all commonly cited as reasons why Toledo has not been as competitive as other cities in Ohio.<sup>lxvi</sup>

This strategy will be implemented through a complementary set of actions intended to better-align state and local priorities over time and address the local structural issues that affect competitiveness. The City of Toledo should convene cross-sector partners at quarterly or semi-annual meetings to discuss and set state-level advocacy priorities. Part this engagement should be organized around the annual Qualified Allocation Plan (QAP) engagement process, and feedback shared during this process should be specific (i.e., specific projects as community priorities and how local priority projects do not score competitively based on the QAP) rather than thematic.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Use of OHFA resources for multifamily development
  - **Community-based:** Organizational capacity to undertake multifamily development
- **Collaboration:** Advocacy and engagement on alignment of state and local priorities
- **Equity:** Increase supply of homes for extremely low-income households

**STRATEGY 4.5. DIVERSIFY MORTGAGE PRODUCTS FOR HOMEOWNERS AND HOMEBUYERS.**

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This strategy will create a wider range of mortgage products for homebuyers and homeowners to use when looking to buy or refinance a home, respectively, in Toledo. It aims to directly address barriers that Toledoans face today in neighborhoods where home values have been depressed due decades of being undervalued by the private sector and further devalued by community conditions, such as vacancy and limited public investment.<sup>lxvii</sup> If more Toledo households, particularly Black households, are going to become homeowners and realize the monetary benefits of homeownership, private-sector financial institutions, in tandem with real-estate professionals and City of Toledo staff, will need to better align their offerings with Toledo's housing market.



This strategy involves exploring and establishing mortgage products and standards at financial institutions that can be used to support small-value mortgages or in neighborhoods with appraisal gaps and adopt alternative standards to qualify for a mortgage.<sup>lxviii</sup>

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Design and implementation of alternative mortgage products and standards
  - **Community-based:** Readiness to use new mortgage products (i.e., financial readiness)
- **Collaboration:** Cross-sector commitment to build multiple pathways to homeownership
- **Equity:** Lessen the racial wealth gap among Black Toledoans

**STRATEGY 4.6. CREATE LOCAL TAX RELIEF FOR ELIGIBLE HOMEOWNERS.**

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This strategy would create a source of tax relief for eligible homeowners (with eligibility based on household or individual characteristics or by geography).<sup>lxix</sup> For existing homeowners, increased property taxes influence their ability to stay in their homes, and even small increases could impact already cost-burdened homeowners (21 percent) and households living on fixed incomes, such as seniors of whom more than one-third are cost-burdened.<sup>lxx</sup>

Implementation of this strategy will involve understanding the fiscal impact of providing tax relief to Toledoans to the City of Toledo’s overall operating budget and fiscal health and designing a tax relief program. Designing a tax relief program will require City of Toledo leaders to work closely with representatives from the main taxing entities (Lucas County; Toledo Public Schools; Washington Local Schools; special assessment districts). Key design considerations include eligibility for the relief (specific populations; based on property tax increase above a set amount; geographies); amount of relief (City of Toledo or special taxing districts only or a portion of the total bill); and how tax relief will be provided (on-bill credit; income tax rebate with state-level approval).

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Design and administration of local tax relief program
  - **Community-based:** Use of local tax relief program
- **Collaboration:** Common agreement on property tax relief to help Toledo homeowners
- **Equity:** Lessen cost-burdens among low-income homeowners and seniors

**STRATEGY 4.7. CREATE TAX RELIEF FOR ELIGIBLE RENTERS.**

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This strategy would establish a statewide tax relief for eligible renters through advocacy to the Ohio General Assembly. This type of relief, often administered through an income tax credit or rebate when filing state income taxes, recognizes that renters indirectly pay a portion of property taxes as part of their rent. This credit would be a new tool at the state level and could help alleviate cost-burdens among Toledo’s renters, 46 percent of whom are cost-burdened.<sup>lxxi</sup>

Implementation of this strategy would involve developing a proposal; working with existing statewide coalitions to build buy-in for this proposal among other cities across Ohio; and coordinating an advocacy campaign among Ohio state lawmakers to move this proposal forward. While the City of Toledo, working in close collaboration with property owners, renters, and institutional partners, can take the lead on crafting a proposal and building local and

state-level support for it, creating a program of this magnitude will require widespread appeal and support from across Ohio, including support from rental property management associations.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Tax policy proposal development; coalition-building; legislative advocacy
  - **Community-based:** Tax policy proposal development; coalition-building; legislative advocacy
- **Collaboration:** Advocacy and engagement on alignment of state and local priorities
- **Equity:** Lessen cost-burdens among low-income renters

**STRATEGY 4.8. BUILD CAPACITY AND COMMITMENT AMONG INSTITUTIONAL PARTNERS.**

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The City of Toledo has a stable of core institutional partners—housing providers and developers, nonprofit intermediaries, anchor institutions, Lucas Metropolitan Housing, and the Lucas County Landbank—who are already leading and implementing several housing and community development activities across the city. The City of Toledo will need to work closely with these institutional partners’ as it implements the strategy in this document over the next 10 years. To do more, some of the City’s core partners echoed the same prerequisite: more capacity, especially for multifamily development. Many also highlighted a need for better cooperation, acknowledging that often activities occur in silos and at times, housing partners are in direct competition for public local and state resources.

To build this capacity, a series of actions, coordinated by the City of Toledo, will be used to deepen capacity for affordable housing activities, particularly ability to use the Low-Income Housing Tax Credit; attract talent to local government and nonprofits; and increase housing partners’ understanding of and commitment to racial equity. Implementation of these actions requires resources for training, hiring employees, and technical assistance—activities that are often difficult to accomplish using public dollars alone. Resourcing these efforts could be a role for local, regional, and state philanthropic organizations; their program-related investments can help invest in the capacity local institutional partners.

**[Side bar content]**

CROSS-CUTTING FACTORS

- **Capacity:**
  - **Institutional:** Organizational capacity to cultivate talent; shared outcomes achievement
  - **Community-based:** Skills to work with institutional partners
- **Collaboration:** Stronger institutional commitment to racial equity as a programmatic outcome
- **Equity:** Increased representation of people of color in local housing activities

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## SECTION 04: IMPLEMENTING TOLEDO'S COMPREHENSIVE HOUSING STRATEGY

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### TOLEDO'S STRATEGIC FRAMEWORK FOR HOUSING

Stakeholders in Toledo said they want this Comprehensive Housing Strategy to result in “demonstrable change”—change in the homes and neighborhoods in Toledo and change in the lives of individuals and families. Being able to see this change requires a plan for and commitment to implementation of the strategies and actions in Toledo's Comprehensive Housing Strategy.

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### TOLEDO'S 10-YEAR ACTION PLAN

The 10-Year Action Plan in this section outlines the following information to guide strategy implementation over the next 10 years:

- **Implementation timeline** – The strategies are organized for implementation across five timeframes:
  1. **Immediate:** Strategies to undertake in the first year of implementation
  2. **Short-term:** Strategies to undertake in the second and third years of implementation
  3. **Medium-term:** Strategies to undertake in the fourth, fifth, and sixth years of implementation
  4. **Long-term:** Strategies to undertake in the last three years of implementation
  5. **Ongoing** – Strategies to undertake consistently across the next 10 years

These strategies and their supporting actions are designed to build on one another. More straightforward or foundational actions should be implemented sooner than more complex ones, which may take more time, resources, and capacity to fully realize. Strategies appear based on the first year where implementation should start, even if implementation actions span multiple timeframes or suggest ongoing support once started.

- **Implementation lead** – Implementation lead refers to the people, organization, elected decisionmakers, or government department or agency who will be responsible for leading implementation of the strategy, even if more groups provide input to shape implementation or aid in it over time. Some strategies need a sole implementer to take action or bring different stakeholders together to advance the collective actions within one strategy, while other strategies have multiple implementation leads because they are all needed to move different actions associated with a strategy forward.
- **Available funding** – Available funding highlights available financial resources that could be used to support direct implementation of the strategy, including opportunities to use the City of Toledo's American Rescue Plan funding through 2024. Some funding requires that the City of Toledo or its partners to compete to receive the funding, while other funding carries its own requirements for use and may not be available to cover all aspects of implementation.

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### PARTNERSHIPS: KEY TO IMPLEMENTATION SUCCESS

Success of Toledo's Comprehensive Housing Strategy requires the ongoing involvement and support of everyone (see Appendix 7 for a table that categorizes the strategies across decisionmakers and community-based organizations). It will take political support from elected leaders to create a supportive policy environment; residents to participate in efforts to craft the specifics of the strategies that affect them; civic leaders and those in the business community to champion these efforts; and core implementers—including City of Toledo staff, local housing nonprofits, developers, neighborhood leaders, Lucas Metropolitan Housing, and Lucas County Land Bank—to work together toward the City's north star for housing.

Central to implementation will be partnerships across neighborhood organizations and residents, local nonprofits,

anchor institutions, financial institutions, and the City of Toledo to move specific actions forward over time. It will require partners to pool resources, break down silos that hinder collaboration, and operate with a high degree of transparency. This type of partnership requires a high degree of trust. It will mean, at times, partners may be helping achieve something for the people of Toledo that they themselves or their organizations may not directly benefit from.

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## RESOURCES: FINANCIAL AND HUMAN CAPITAL

Another critical component for implementation is adequately resourcing the actions and strategies as they move forward. Having funding is important, and specific funding sources (either those already exist or those that will be created through implementation of strategies in this document) are highlighted for each action (as applicable) in the action plan, starting on page 47.

These resources should be allocated through a racial equity lens, using tools such as a racial equity impact assessment in the City’s budget process as way to incorporate this outcome into how City of Toledo invests its dollars. But also having the human capital—within city government, community-based organizations, and nonprofits—to carry out these actions is also another resource for successful implementation.

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## MEASURING AND TRACKING IMPLEMENTATION PROGRESS

How will Toledo leaders and residents know when this work is done? By 2031, the City of Toledo will have made substantial progress toward having improved housing market conditions, vibrant neighborhoods, greater equity and diversity and residents with more stable housing conditions. More residents will feel safer and more secure in their homes; more will see a path to becoming homeowners; and fewer vacant homes and more amenities in their neighborhoods.

The framework below (Table 2) shows how the City of Toledo, on behalf of all those involved in implementation, can consistently track and measure progress toward meeting these goals over the next 10 years. This framework should be used to report progress on implementation to Toledoans; build accountability for implementation across the City of Toledo and its partners; and inform adjustments to strategies over time (see Appendix 8 for more guidance and information about measuring progress).

**Table 2. Indicators to Track Implementation Progress**

<i><b>Indicator</b></i>	<i><b>Baseline</b></i>	<i><b>Direction of change</b></i>	<i><b>Estimated 10-year target</b></i>	<i><b>Measurement Scale</b></i>	
				<i><b>City</b></i>	<i><b>Neighborhood</b></i>
<i><b>Housing vacancy rate</b></i>	15% vacancy (2014-2018)	↓	10% vacancy	✓	✓
<i><b>Rates of substantial improvements on existing housing</b></i>	998 annual permits (2019)	↑	1,198 annual permits	✓	✓
<i><b>New housing construction activity</b></i>	27 annual permits (2015-2019)	↑	32 annual permits	✓	✓
<i><b>Diversity of housing types</b></i>	34,000 “missing middle units” (2014-2018)	↑	34,300 “missing middle” units	✓	✓
<i><b>Home values</b></i>	\$79,900 median home value (2014-2018)	↑	\$95,500 median home value	✓	✓
<i><b>Nuisance properties</b></i>	2,564 properties referred for abatement annually (2020)	↓	2,050 properties referred for abatement annually on average	✓	✓

<b>Neighborhood engagement</b>	Measure to Be Developed	↑	Measure to Be Developed	✓	✓
<b>Vacant lots returned to productive use</b>	349 properties returned to productive use by Land Bank annually (2016-2018)	↑	400 properties returned to productive use by Land Bank annually	✓	✓
<b>Census Tracts with Poverty Rates Greater than 20%</b>	61 census tracts (2015-2019)	↓	55 or fewer census tracts	✓	
<b>Racial segregation level</b>	White/Black Dissimilarity Index of 57.7 (2010)	↓	White/Black Dissimilarity Index below 50	✓	
<b>Racial disparities in cost burdens</b>	8 percentage point difference between White and BIPOC renter cost burdens (2013-2017)	↓	0 percentage point difference	✓	
<b>Racial disparities in homeownership rate</b>	29.5 percentage point difference between White and BIPOC householders (2015-2019)	↓	23.6 percentage point difference	✓	
<b>Supply of rental units affordable at 30 percent of AMI</b>	9,970 units (2013-2017)	↑	12,470 units (including those in development)	✓	
<b>Housing cost-burdens</b>	44% of renters and 21% homeowners (2014-2018)	↓	35% renters and 17% homeowners	✓	✓
<b>Increased ability to age in place</b>	37% of region's seniors live in Toledo (2015-2019)	-	37% of region's seniors still live in Toledo	✓	
<b>Decreased exposure to lead</b>	1,728 Lead Safe Certificates issued (2020, cumulative)	↓	2,328 Lead Safe Certificates issued (cumulatively)	✓	✓

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<b>YEAR 1: IMPLEMENTATION ACTIONS</b>		
<b>How will this strategy be implemented?</b>	<b>Who can lead implementation?</b>	<b>What funding can support it?</b> <i>** = Funding created through implementation of another strategy</i>
<b>Adopt a cohesive housing, economic development, and land use policy framework.</b>		
<ul style="list-style-type: none"> <li>• Evaluate the land use strategies, which were informed by findings from the City's Strategic Assessment Framework, in this Comprehensive Housing Strategy as part of Toledo's Comprehensive Plan update.</li> <li>• Create a cross-departmental implementation team to coordinate implementation of the City of Toledo's land use, economic development, and housing decisions.</li> <li>• Engage peer departments in planning and implementation efforts to gather specific input on ways to build closer connections across Toledo's land use, economic development, and housing plans and implementation activities.</li> <li>• Update existing land use, economic development, and housing tools and policies to build consistency across implementation.</li> </ul>	Toledo Department of Neighborhoods Toledo Plan Commission Toledo Economic Development Department Toledo Department of Building Inspections	N/A
<b>Create a local, dedicated source for housing activities.</b>		
<ul style="list-style-type: none"> <li>• Convene a cross-sector workgroup to develop a proposal for a dedicated funding source (source; key uses; opportunities to address disparities and align with implementation of Toledo's Comprehensive Housing Strategy; exploration of unintended consequences). Gather public input on the source's uses through neighborhood listening sessions.</li> <li>• Develop a public outreach campaign to build awareness of local housing needs and support creation of a dedicated local source among Toledo residents.</li> <li>• Initiate creation of a local dedicated funding source (for instance, ballot measure, local legislation to increase or establish fee).</li> <li>• Develop the administrative structure via local legislation to manage this resource (Toledo-Lucas County Affordable Housing Development Fund).</li> <li>•</li> </ul>	Toledo's Mayor's Office	Source to be determined as part of implementation
<b>Improve delivery and effectiveness of existing public and nonprofit programs.</b>		

<ul style="list-style-type: none"> <li>• Convene a working group to identify opportunities to de-duplicate; streamline; or better align local housing programs and design a common intake and eligibility evaluation process.</li> <li>• Offer grants to support community resource navigator positions at local nonprofits to assist with implementation of new and existing programs.</li> <li>• Conduct outreach about existing or new housing programs and how to access them using marketing materials in multiple languages and mediums.</li> <li>• Undertake proactive code enforcement (as part of implementing recommendations from the City's 2021 code enforcement assessment).</li> </ul>	<p>Toledo Department of Neighborhoods  Maumee Valley Habitat for Humanity  Toledo NeighborWorks  Pathway Toledo  LISC Toledo  Lucas County Landbank  Lucas Metropolitan Housing</p>	<p>N/A</p>
<p><b>Develop a policy to guide union labor requirements in residential development.</b></p>		
<ul style="list-style-type: none"> <li>• Convene a Union Labor for Housing Taskforce to lead development of a policy framework and proposal for Toledo City Council.</li> <li>• Vet the policy framework and proposal with Toledo residents, developers, and workforce and economic development agencies.</li> <li>• Establish consistent standards for use, monitoring, and reporting of union labor in residential projects not subject to the City of Toledo's current project labor standards via local legislation.</li> <li>• Monitor and evaluate policy implementation to understand effect on development patterns and ability to use union labor consistently in residential development.</li> </ul>	<p>Toledo Mayor's Office  Toledo City Council  Local &amp; regional trade organizations</p>	<p>N/A</p>
<p><b>Diversify local funding sources to finance development.</b></p>		
<ul style="list-style-type: none"> <li>• Use federal Section 108 Loan Guarantee Funds to support a wider range of activities.</li> <li>• Align flexible funding from the American Rescue Plan to seed key public resources or initiatives (such as a local source of funding or place-based reinvestment fund).</li> <li>• Improve financing and underwriting of small (2-4 unit) preservation deals.</li> <li>• Engage more Community Development Financial Institutions (CDFIs) to help fill funding gaps (e.g., small-value loans; pre-development funding; acquisition funding)</li> </ul>	<p>Toledo Department of Neighborhoods</p>	<p>Local dedicated funding source**  Section 108 Loan Guarantee Funds  American Rescue Plan  Local cross-sector reinvestment fund**  Private-sector financing</p>



<ul style="list-style-type: none"> <li>• Create common marketing materials across cross-sector partners to build awareness of different resources available to developments working in Toledo.</li> </ul>		
<b>Increase homebuyer assistance programs in historically redlined communities.</b>		
<ul style="list-style-type: none"> <li>• Incorporate economic empowerment actions that increase access to its homebuyer assistance program, Home At Last; offer expanded homebuyer education and foreclosure prevention services; and create tools such as Individual Development Accounts as part of its programming federal funding in Neighborhood Revitalization Strategy Areas (NRSA).</li> <li>• Use the NRSA planning process to understand what other support Black households need to become or stay homeowners and adjust approaches based on their feedback (including areas for increased flexibility, such as lower interest rates, shifting from loans to grants, and simplified processes)</li> <li>• Prioritize use of existing homeowner assistance programs (post-purchase counseling and foreclosure prevention, down payment assistance, and lease-to-own programs).</li> <li>• Increase visibility and access to financial education and homeownership preparation for renters.</li> <li>• Increase visibility and access to existing and new mortgage products at private financial institutions.</li> <li>• Create a common framework to track and report outcomes related to homeownership assistance programs across the City of Toledo and local partners.</li> </ul>	<p>Toledo Department of Neighborhoods  Maumee Valley Habitat for Humanity  Year 16 Initiative partners  Private financial institutions</p>	<p>Local dedicated funding source**  Local cross-sector reinvestment fund**  Community Development Block Grant  Section 108 Loan Guarantee Fund  HOME Investment Partnership  American Rescue Plan  Private-sector financing</p>
<b>Conduct outreach to landlords and tenants about Toledo's source of income policy.</b>		

<ul style="list-style-type: none"> <li>• Develop and deliver a quarterly training for landlords on the City of Toledo’s source of income protection policy and LMH’s Housing Choice Voucher program.</li> <li>• Partner with landlord and property owner organizations to convene peer-learning events (panels, workshops, webinars).</li> <li>• Explore opportunities to create additional resources to support effective implementation of Toledo’s source of income protection policy.</li> <li>• Engage landlords, property owners, tenants, and other stakeholders on a regular basis to through improved tenant protections infrastructure to better align outreach and enforcement of Toledo’s tenant protections (see “Increase tenant protections enforcement and resolution infrastructure”).</li> </ul>	<p>Toledo Department of Neighborhoods Lucas Metropolitan Housing</p>	<p>Toledo General Fund HUD’s Fair Housing Initiatives Program Community Development Block Grant Philanthropic grants or sponsorships</p>
<p><b>Increase transparency and predictability in development decisions.</b></p>		
<ul style="list-style-type: none"> <li>• Develop and maintain materials that outline Toledo’s regulatory process (timeline, checklist of required documents).</li> <li>• Create an online portal to submit and track development applications.</li> <li>• Hire a development liaison as a single point-of-contact for development applications.</li> <li>• Conduct ongoing engagement of local developers (attend standing meetings to share materials and information; conduct surveys to understand key issues).</li> <li>• Engage various commissions responsible for land use approvals, developers, and Toledo residents through proactive and ongoing outreach.</li> <li>• Form advisory committees or boards as needed to enable sustained engagement and knowledge-transfer across individual policy decisions and outreach efforts.</li> <li>• Update plans regularly to reduce reliance on the variance approval process.</li> </ul>	<p>Toledo Plan Commission Toledo Department of Building Inspections Toledo City Council</p>	<p>N/A</p>
<p><b>Increase competitiveness for state housing resources.</b></p>		
<ul style="list-style-type: none"> <li>• Inventory local sites or properties and assess relative to QAP and local priorities (e.g., QAP priorities in relation landbanked or city-owned properties; location of subsidized and unsubsidized affordable properties; partner-led work for community</li> </ul>	<p>Toledo Department of Neighborhoods LISC Toledo</p>	<p>Local dedicated funding source** Local cross-sector reinvestment fund** Section 4 Program</p>

<p>investments; adopted neighborhood master plans, and Neighborhood Revitalization Strategy Area boundaries).</p> <ul style="list-style-type: none"> <li>• Organize a cross-sector coalition to engage state decisionmakers on a regular basis.</li> <li>• Use the City of Toledo's soft funding commitments to maximize competitiveness for state multifamily finance awards (e.g., intracity competition; alignment with local needs; alignment with QAP criteria).</li> <li>• Offer pre-development support for projects that meet local development goals.</li> <li>• Provide technical assistance and capacity-building to developers or organizations interested in using state multifamily finance programs (e.g., LIHTC 101 workshops; joint venture matchmaking; review of applications to maximize their scoring and potential for local and state funding).</li> </ul>		<p>Community Development Block Grant HOME Investment Partnership Philanthropic grants or sponsorships</p>
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<b>YEARS 2-3: IMPLEMENTATION ACTIONS</b>		
<b>How will this strategy be implemented?</b>	<b>Who can lead implementation?</b>	<b>What funding can support it?</b> <i>** = Funding created through implementation of another strategy</i>
<b>Develop a place-based source of funding for community reinvestment.</b>		
<ul style="list-style-type: none"> <li>• Convene key stakeholders to design a place-based funding source (including place-based criteria for its use).</li> <li>• Incorporate opportunities to support capacity-building efforts for residents and organizations in the neighborhoods where the source will be used (grants via the funding source or incentives when using it).</li> <li>• Identify and establish the administrative structure of the fund, including who will administer it and determine awards.</li> <li>• Align existing place-based resources and fundraise across cross-sector partners to sustain the fund.</li> </ul>	Toledo's Mayor's Office Philanthropic organizations Private financial institutions Community-based organizations	Local dedicated funding source** Section 108 Loan Guarantee Fund Community Development Block Grant HOME Investment Partnership American Rescue Plan Toledo General Fund Private-sector financing Philanthropic grants
<b>Establish a city-chartered Redevelopment Authority to facilitate property reuse &amp; development.</b>		
<ul style="list-style-type: none"> <li>• Determine and develop the RDA's structure (in close collaboration with the Toledo City Attorney's Office).</li> <li>• Convene a cross-sector taskforce to guide RDA creation (mission and vision; key functions; and Board of Directors representation).</li> <li>• Adopt local legislation to establish the RDA.</li> <li>• Align flexible funding from the American Rescue Plan to resource the RDA initially.</li> <li>• Align existing and new funding resources to support RDA-led activities.</li> </ul>	Toledo Department of Neighborhoods	American Rescue Plan Toledo General Fund U.S. EPA Brownfield Revolving Loan Fund HOME Investment Partnership Community Development Block Grant Section 108 Loan Guarantee Fund
<b>Increase tenant protections enforcement and resolution infrastructure.</b>		
<ul style="list-style-type: none"> <li>• Allocate funding to support the creation of a new tenant liaison position for the City of Toledo.</li> <li>• Define the key duties and roles of the tenant liaison.</li> <li>• Advertise and hire a tenant liaison (with an emphasis on cultural and geographic relevance).</li> <li>• Conduct outreach and education about tenants' rights and landlords' responsibilities.</li> <li>• Track and identify ways to strengthen the City of Toledo's tenant protection policies and infrastructure.</li> </ul>	Toledo Mayor's Office	Toledo General Fund Community Development Block Grant American Rescue Plan Philanthropic grants
<b>Expand Community Revitalization Areas.</b>		

<ul style="list-style-type: none"> <li>• Evaluate existing post-1994 CRAs to identify opportunities to amend legislation to incorporate housing goals.</li> <li>• Identify preliminary areas to expand post-1994 CRAs and conduct housing studies to support expansion.</li> <li>• Work with neighborhoods residents and community-based organizations to develop housing goals and tracking criteria for amended or expanded post-1994 CRA legislation.</li> <li>• Develop local legislation, informed by evaluations, to establish new or amended post-1994 CRAs.</li> <li>• Track impact of housing goals in CRAs.</li> <li>• Develop internal processes to coordinate use of CRA and other public resources across the Departments of Neighborhoods and Economic Development.</li> <li>• Increase visibility and awareness of Toledo’s CRA Program via information sessions.</li> </ul>	<p>Toledo Department of Economic Development Toledo City Council</p>	<p>N/A</p>
<p><b>Expand by-right zoning for higher density development.</b></p>		
<ul style="list-style-type: none"> <li>• Determine where to allow higher density development (e.g., areas near existing or planned public transportation service) through Toledo’s Comprehensive Plan update.</li> <li>• Explore opportunities for higher density development through neighborhood planning processes (see “Increase neighborhood planning”).</li> <li>• Analyze impacts on other land-use regulations, including their impact on neighborhood or revitalization goals.</li> <li>• Align Toledo’s Capital Improvement Plan and other infrastructure investments in areas with higher density to support higher-capacity infrastructure (as needed).</li> </ul>	<p>Toledo Plan Commission</p>	<p>N/A</p>
<p><b>Expand by-right zoning for missing middle housing types.</b></p>		

<ul style="list-style-type: none"> <li>• Identify missing middle housing types to allow by-right as part of updating Toledo's Comprehensive Plan.</li> <li>• Engage developers, neighborhood leaders, and Toledo residents to identify where to allow missing middle housing types.</li> <li>• Analyze the impact of by-right zoning for missing middle housing types on other land-use regulations.</li> <li>• Incorporate missing middle housing types into Toledo's Municipal Zoning Code, guided by changes in Toledo's Comprehensive Plan.</li> <li>• Conduct outreach to developers and neighborhood residents about updated standards for missing middle housing.</li> </ul>	Toledo Plan Commission	N/A
<b>Develop by-right zoning for infill development.</b>		
<ul style="list-style-type: none"> <li>• Identify and understand immediate infill opportunities on vacant, landbanked properties.</li> <li>• Create a priority review track for applications that request rezonings for infill development.</li> <li>• Make small-scale changes (setbacks and lot sizes) to Toledo's Municipal Zoning Code to support immediate infill opportunities through incremental development.</li> <li>• Identify infill housing types to allow by-right as part of updating Toledo's Comprehensive Plan.</li> <li>• Engage developers, neighborhood leaders, and Toledo residents to identify where to allow infill housing types.</li> <li>• Incorporate infill housing types into Toledo's Municipal Zoning Code, guided by changes in Toledo's Comprehensive Plan.</li> <li>• Conduct outreach to developers and neighborhood residents about updated standards for infill housing.</li> </ul>	Toledo Plan Commission Toledo Department of Building Inspections Lucas County Land Bank	N/A
<b>Amend zoning standards to support group living activities.</b>		

<ul style="list-style-type: none"> <li>• Review land uses; key definitions for group living facilities (households, community corrections facilities, homeless shelters, long term care facilities); and key barriers to existing definitions.</li> <li>• Convene a taskforce (including affected populations and service providers) to develop a policy proposal for ways to amend zoning standards for group living standards (increased flexibility; ability to build group living facilities in more zones).</li> <li>• Adopt amended zoning standards for group living facilities via local legislation or as part of Toledo’s upcoming Comprehensive Plan update.</li> </ul>	Toledo Plan Commission	N/A
<b>Diversify mortgage products for potential homebuyers.</b>		
<ul style="list-style-type: none"> <li>• Identify the primary barriers to small-value lending and develop solutions (e.g., cross-sector loan pools for small-value mortgages; process or technology improvements that reduce transaction costs).</li> <li>• Identify the primary barriers to qualifying for conventional mortgages and align homebuyer education efforts and financial institutions’ standards to address them.</li> <li>• Leverage Community Reinvestment Act requirements to encourage creation of new mortgage products and alternative standards for mortgages.</li> <li>• Expand use of soft second loans for home mortgages in neighborhoods with appraisal gaps.</li> <li>• Conduct outreach through neighborhood-based groups, businesses, and schools to involve residents’ in the creation of new mortgage products and standards.</li> </ul>	Private financial institutions Toledo Department of Neighborhoods	Private-sector financing
<b>Invest in quality of life improvements in tandem with housing investments.</b>		
<ul style="list-style-type: none"> <li>• Align capital improvements completed through Toledo’s Capital Improvement Program and with other funding, such as Section 108, with place-based efforts in strategic neighborhoods.</li> <li>• Increase use of the City of Toledo’s District Improvement Program (including for placemaking and installation of arts and culture and historical features) among community-based organizations.</li> <li>• Incorporate quality-of-life improvements as eligible uses into new place-based funding sources (see “Develop a place-based source of funding for community reinvestment”).</li> <li>• Use racial impact assessments to guide departmental budget requests (including public services and capital improvements).</li> </ul>	Toledo Mayor’s Office Community-based organizations Lucas Metropolitan Housing	Local cross-sector reinvestment fund** Toledo Capital Improvement Program Community Development Block Grant Section 108 Loan Guarantee Fund U.S. EPA Brownfield Revolving Loan Fund 2% Utility Infrastructure Program (water & sewer only) Tax Increment Financing District Improvement Program New Market Tax Credit Philanthropic grants

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| <ul style="list-style-type: none"><li>• Create partnerships with Toledo Public Schools; real-estate professionals; employers; and community leaders to market neighborhood assets to potential homebuyers.</li><li>• Create a citywide marketing campaign that highlights Toledo neighborhoods, their assets, and available housing programs.</li><li>• Use Choice Neighborhoods Planning Grant to identify and pilot neighborhood quality-of-life improvements.</li></ul> |  |  |
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<b>YEARS 4-6: IMPLEMENTATION ACTIONS</b>		
<b>How will this strategy be implemented?</b>	<b>Who can lead implementation?</b>	<b>What funding can support it?</b> <i>** = Funding created through implementation of another strategy</i>
<b>Create new tools to lower development costs.</b>		
<ul style="list-style-type: none"> <li>Identify policy and regulatory contributors to development costs such as parking requirements, building codes, fees, and environmental review requirements to reduce.</li> <li>Develop fee reductions or waivers and supporting guidance for when to offer them (housing type; public subsidy; financial feasibility).</li> <li>Decrease the complexity and processing times for permitting and approvals.</li> <li>Align Toledo's Capital Improvement Plan and use of federal funds to support activities outside of a development budget, such as structure demolition or infrastructure improvements.</li> </ul>	Toledo Plan Commission Toledo's Mayor's Office	N/A
<b>Create a LeadSafe Implementation Fund.</b>		
<ul style="list-style-type: none"> <li>Develop a proposal for the Toledo LeadSafe Fund.</li> <li>Allocate public funding to seed the Toledo LeadSafe Fund.</li> <li>Fundraise from the private and philanthropic sectors (with an emphasis on outreach to healthcare providers) to capitalize the Toledo LeadSafe Fund.</li> <li>Issue a request for proposals to select a fund administrator.</li> <li>Conduct outreach to eligible property owners and tenants about using the Toledo LeadSafe Fund.</li> </ul>	Toledo Lead Poisoning Prevention Coalition	Community Development Block Grant Toledo General Fund Philanthropic grants HUD's Healthy Homes Program LeadSafe program fees**
<b>Expand existing tenant protections.</b>		
<ul style="list-style-type: none"> <li>Engage working groups to develop the policy parameters for expanded tenant protections and fair chance provisions.</li> <li>Adopt expanded tenant protections via local legislation.</li> <li>Align or fundraise for resources to support services outlined in updated policy (subsidized legal services for tenants in eviction court; resources for justice-involved people).</li> <li>Identify avenues to align resources, such as emergency rental assistance, to households facing an eviction to avoid legal proceedings.</li> <li>Identify avenues to remove other barriers affecting justice-involved people (tenant screening and leasing policies by LMH).</li> </ul>	Toledo City Council Toledo's Mayor's Office Lucas Metropolitan Housing	Community Development Block Grant HOME Investment Partnership HUD's Fair Housing Initiatives Program Toledo General Fund Philanthropic grants

<ul style="list-style-type: none"> <li>• Conduct ongoing education and outreach to tenants and landlords on these new policies, and available anti-evictions and other supportive resources.</li> </ul>		
<b>Create local tax relief for eligible homeowners.</b>		
<ul style="list-style-type: none"> <li>• Convene an owners' property tax relief taskforce to guide creation of a local tax relief program.</li> <li>• Create the program design framework, based on direct engagement of existing homeowners.</li> <li>• Pass local legislation to establish the property tax relief program and related intergovernmental agreements as needed.</li> <li>• Partner with community-based organizations to conduct outreach (including assistance with applications if needed) to program beneficiaries.</li> </ul>	<p>Toledo City Council Toledo's Mayor's Office Community-based organizations</p>	<p>N/A</p>
<b>Increase neighborhood planning.</b>		
<ul style="list-style-type: none"> <li>• Define key land use changes as part of the neighborhood master planning to incorporate into a neighborhood overlay (where the zone would be located and what it would support, such as specific housing types, density, form).</li> <li>• Create a neighborhood overlay zone as part of amending neighborhood master plans to Toledo's Comprehensive Plan, guided by the land use changes in the neighborhood master planning process.</li> <li>• Identify areas appropriate for special use or cultural districts as part of updating Toledo's Comprehensive Plan.</li> </ul>	<p>Toledo Design Collective Toledo Plan Commission</p>	<p>National Endowment for the Arts Our Town Grant Philanthropic grants</p>
<b>Complete comprehensive blight removal and reinvestment in homes.</b>		
<ul style="list-style-type: none"> <li>• Create a centralized inventory of existing blight removal tools available for use in the City of Toledo.</li> <li>• Develop a blight removal charter to guide coordinated decision making around blight removal.<sup>lxxii</sup></li> <li>• Align use of federal resources for blight removal in strategic neighborhoods.<sup>lxxiii</sup></li> <li>• Explore use of pay-for-success models to increase use of private capital in blight removal.<sup>lxxiv</sup></li> <li>• Create a common data dashboard or centralized land management system to inform and coordinate use of blight removal tools.</li> </ul>	<p>Toledo Department of Neighborhoods Lucas County Landbank Maumee Valley Habitat for Humanity NeighborWorks Toledo Toledo residents</p>	<p>Toledo LeadSafe Fund** Community Development Block Grant Section 108 Loan Guarantee Fund HOME Investment Partnership (in conjunction with HOME activities) HUD Hazard Control grants HUD's Healthy Homes Program OHFA Neighborhood Initiatives Program Toledo rental registry fees**</p>

<ul style="list-style-type: none"> <li>• Undertake periodic updates of the Toledo Survey Project to understand high-level trends to guide blight removal efforts.</li> <li>• Establish and convene a blight action committee on a quarterly basis.</li> <li>• Undertake resident-led blight removal efforts (track and report vacant properties; green vacant lots; conduct outreach about available home rehabilitation resources)</li> <li>• Support resident-led efforts to develop and implement blight reduction plans.<sup>lxxv</sup></li> </ul>		
<p><b>Connect redevelopment projects and workforce development initiatives.</b></p>		
<ul style="list-style-type: none"> <li>• Create partnerships between local labor unions; workforce development organizations; Toledo Public Schools; City of Toledo; and community-based organizations to link job training and opportunities with place-based activities and large-scale development projects.</li> <li>• Incorporate community benefits agreements, such as first source hiring, into large-scale projects (new construction and redevelopment).</li> <li>• Create scholarship programs to cover the cost of training programs and state and local certification requirements (with selection preferences for people of color and neighborhoods).</li> <li>• Track linkages between workforce development efforts in housing development projects, including hiring of residents in the neighborhood where the projects occur and other characteristics.</li> <li>•</li> </ul>	<p>Toledo Mayor's Office  Toledo Department of Neighborhoods  Local &amp; regional trade organizations  Philanthropic organizations  Civic organizations</p>	<p>Community Development Block Grant  Section 108 Loan Guarantee Fund  Philanthropic grants or sponsorships  Civic grants or sponsorships</p>

<b>YEARS 7-10: IMPLEMENTATION ACTIONS</b>		
<b>How will this strategy be implemented?</b>	<b>Who can lead implementation?</b>	<b>What funding can support it?</b> <i>** = Funding created through implementation of another strategy</i>
<b>Create a rental registry for housing health and safety standards.</b>		
<ul style="list-style-type: none"> <li>• Conduct a study of the legal structure, administration (including staff capacity), and financial costs associated with creating a rental registry program.</li> <li>• Convene a working group to define the main parameters of a rental registry program for Toledo.</li> <li>• Establish a rental registry through local legislation, informed by the study and workgroup recommendations.</li> <li>• Align existing code enforcement, blight removal, and home repair resources to support implementation.</li> <li>• Conduct outreach to landlords, property owners, and tenants about the rental registry program and available resources (in tandem with other outreach efforts as applicable).</li> </ul>	Toledo's Mayor's Office Toledo City Council	Toledo rental registry fees** Toledo General Fund
<b>Establish community ownership models.</b>		
<ul style="list-style-type: none"> <li>• Organize community residents to develop a shared vision for a community land trust.</li> <li>• Pursue technical assistance to design organizational and governance structures; develop a business plan; and assess feasibility of initial projects.</li> <li>• Fundraise from cross-sector partners to seed initial operating budget for a community land trust.</li> <li>• Establish policies to enable property acquisition or public land transfer of vacant properties to landbank when applicable (via City of Toledo and Lucas County Landbank).</li> <li>• Develop partnerships with existing housing organizations to enable homeownership opportunities to part of the community land trust (Maumee Valley Habitat for Humanity; Year 16 Initiative partners).</li> </ul>	Philanthropic organizations Community-based organizations Private financial institutions	Philanthropic grants FHLB Homeownership Set-Aside Program <a href="#">HUD Section 213: Mortgage Insurance for Cooperative Housing</a> <a href="#">Community Development Block Grant (if tied to neighborhood revitalization)</a>
<b>Create tax relief for eligible renters.</b>		
<ul style="list-style-type: none"> <li>• Convene a renters' property tax relief taskforce to guide creation of a state tax relief program.</li> </ul>	Toledo Department of Neighborhoods LISC Toledo	N/A

<ul style="list-style-type: none"> <li>• Create a policy proposal for a statewide renter tax relief program, based on direct engagement of existing renters and rental property owners.</li> <li>• Work with existing statewide coalitions to advance a renter property tax relief program as a common policy priority.</li> <li>• Undertake an advocacy campaign during the Ohio General Assembly’s legislative session (independently or as part of other state-level advocacy efforts).</li> </ul>		
<p><b>Develop a preservation strategy for unsubsidized affordable multifamily properties.</b></p>		
<ul style="list-style-type: none"> <li>• Commission a study to inventory and assess opportunities to preserve the City of Toledo’s unsubsidized affordable multifamily properties.</li> <li>• Create a right-of-first refusal policy via local legislation and supporting regulations (including criteria to assist with prioritizing properties for preservation through this policy).</li> <li>• Build capacity among developers through trainings about project selection and available financing for preserving unsubsidized affordable multifamily properties.</li> <li>• Align uses and administration of the Toledo-Lucas County Affordable Housing Development Fund to support preservation activities.</li> </ul>	<p>Toledo Department of Neighborhoods</p>	<p>Toledo General Fund  Local dedicated funding source**  PACE  Low-Income Housing Tax Credit  OHFA Housing Development Gap Financing Program  FHA 223(f) Multifamily Loan Insurance Program  Freddie Mac Small-Balance Loan Program  Freddie Mac NOAH Preservation Loan</p>

<b>ONGOING IMPLEMENTATION ACTIONS</b>		
<b>How will this strategy be implemented?</b>	<b>Who can lead implementation?</b>	<b>What funding can support it?</b> <i>** = Funding created through implementation of another strategy</i>
<b>Build capacity at community-based organizations.</b>		
<ul style="list-style-type: none"> <li>• Integrate capacity-building assessments for implementation into neighborhood planning efforts.</li> <li>• Undertake a comprehensive capacity-building needs assessment to determine what model(s) could support neighborhood-level initiatives over the next 10 years (for example, citywide coalition of neighborhoods; community development corporations serving several adjacent areas).</li> <li>• Undertake neighborhood capacity self-assessments, guided by publicly available tools.<sup>lxvii</sup></li> <li>• Use of federal resources for strategic capacity-building.</li> <li>• Align capacity-building with place-based efforts through tactics such as community-led implementation taskforce; job placement and training opportunities; and joint venture incentives.</li> </ul>	Toledo Design Collective Toledo Department of Neighborhoods Philanthropic organizations	Section 4 Program Community Development Block Grant HOME Investment Partnership Philanthropic grants or sponsorships Civic grants or sponsorships
<b>Build capacity among institutional partners.</b>		
<ul style="list-style-type: none"> <li>• Incentivize use of joint ventures in local development projects.</li> <li>• Provide technical assistance to community-based organizations to increase capacity for multifamily development and use of the Low-Income Housing Tax Credit applications.</li> <li>• Offer public service fellowships to graduating college students or recent graduates to cultivate local community development talent.</li> <li>• Align existing and new grant opportunities with institutional partners' needs, including nonprofit capacity-building.</li> <li>• Incorporate racial equity criteria into funding solicitations administered by the Department of Neighborhoods.</li> <li>• Use performance-based contracts to build a stronger connection to use of public housing and community development funding and desired outcomes.</li> </ul>	Toledo Department of Neighborhoods Philanthropic organizations Civic organizations	Section 4 Program Community Development Block Grant HOME Investment Partnership Philanthropic grants or sponsorships Civic grants or sponsorships
<b>Conduct ongoing public outreach about housing issues and available resources.</b>		

<ul style="list-style-type: none"> <li>• Increase frequency of the City of Toledo’s capacity building institute, launched in 2021.</li> <li>• Sponsor regular community engagement training at institutional partners.</li> <li>• Establish community engagement positions at institutional partners, with a goal to hire from neighborhoods where work is frequently occurring.</li> <li>• Establish a Housing Advisory Board to lead implementation of Toledo’s Comprehensive Housing Strategy and share neighborhood-based information and concerns with City of Toledo staff and institutional partners.</li> <li>• Convene an annual housing event to gather and share information on housing needs, activities, and available resources for neighborhoods and Toledo residents.</li> </ul>	<p>Toledo Department of Neighborhoods Philanthropic organizations Private financial institutions Toledo’s Mayor’s Office</p>	<p>Community Development Block Grant Philanthropic grants or sponsorships Civic grants or sponsorships</p>
<p><b>Launch a public education campaign about housing for elected leaders.</b></p>		
<ul style="list-style-type: none"> <li>• Develop key messages and messaging materials for use among institutional and community partners.</li> <li>• Develop a speakers’ bureau with representation from institutional and community partners.</li> <li>• Incorporate briefings and other updates on Toledo’s Comprehensive Housing Strategy implementation into annual City Council activities (annual retreat, budget meetings).</li> <li>• Organize neighborhood-level educational campaigns (e.g., project or neighborhood tours, advocacy on specific policy changes or issues) for elected leaders.</li> <li>• Sponsor communitywide events (e.g., UnDesign the Redline) through anchor institutions to highlight the root causes of housing needs and disparities in Toledo.</li> </ul>	<p>Toledo Department of Neighborhoods Philanthropic organizations Private financial institutions Community-based organizations</p>	<p>Community Development Block Grant Philanthropic grants Civic grants</p>
<p><b>Increase fair housing education.</b></p>		
<ul style="list-style-type: none"> <li>• Produce fair housing materials in different languages and tailored to audience.</li> <li>• Host workshops, trainings, and seminars for specific audiences (for instance, landlords; tenants; housing voucher holders; potential homebuyers).</li> <li>• Pilot tactics to increase cultural relevance of fair housing outreach and materials (for instance, language, messengers, and formats).</li> </ul>	<p>Fair Housing Center Toledo Department of Neighborhoods Community-based organizations</p>	<p>HUD’s Fair Housing Initiatives Program Community Development Block Grant Philanthropic grants Civic grants</p>

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| <ul style="list-style-type: none"><li>• Pilot tactics to increase youth engagement and understanding of fair housing rights (for instance, fair housing school curriculum; poster contest; human rights camp).</li><li>• Seek competitive federal resources from HUD's Fair Housing Initiatives Program to support fair housing education activities.</li><li>• Restart the Fair Housing Implementation Council (FHIC) to support and coordinate implementation.</li></ul> |  |  |
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## ENDNOTES

<sup>i</sup> The quantitative data in this report comes from the following datasets: 2000 & 2010 Decennial Census, 2010 & 2018 American Community Survey (ACS) 5-Year Estimates, 2018–2020 Zillow, 2017 HUD Comprehensive Housing Strategy, 2020–2025 City of Toledo Analysis of Impediments, 2025 ERSI Forecast. Qualitative data in this report comes from the following sources: Toledo Comprehensive Housing Strategy: Stakeholder Engagement; , Toledo’s 2020–2024 Consolidated Plan, 2020 Exploratory Assessment and selected Neighborhood Master Plans (Old South End, Junction, Uptown, Monroe Auburn and Vistula).

<sup>ii</sup> 2025 ERSI Forecast (see [https://downloads.esri.com/esri\\_content\\_doc/dbl/us/J10268\\_Methodology\\_Statement\\_2020-2025\\_Esri\\_US\\_Demographic\\_Updates.pdf](https://downloads.esri.com/esri_content_doc/dbl/us/J10268_Methodology_Statement_2020-2025_Esri_US_Demographic_Updates.pdf))

A full overview of the ESRI methodology can be found here.

<sup>iii</sup> U.S. Census Bureau, 2014–2018 American Community Survey 5-Year Estimates

<sup>iv</sup> 2018–2020, Zillow. Accessed 11/25/2020

<sup>v</sup> 2010 & 2018 American Community Survey 5-Year Estimates

<sup>vi</sup> U.S. Census Bureau, 2014–2018 American Community Survey 5-Year Estimates

<sup>vii</sup> 2018–2020, Zillow. Accessed 11/25/2020

<sup>viii</sup> This assumes a 30-year fixed loan term with a 20 percent down payment.

<sup>ix</sup> 2013–2017 Comprehensive Housing Affordability Strategy (CHAS)

<sup>x</sup> U.S. Census Bureau, 2014–2018 American Community Survey 5-Year Estimates

<sup>xi</sup> *Forward Toledo: An Exploratory Assessment to Inform Future Comprehensive Planning*, December 2020

<sup>xii</sup> Definition via <https://missingmiddlehousing.com/>

<sup>xiii</sup> Homes built prior to the 1978 are likely to contain lead-based paint (see <https://www.cdc.gov/nceh/lead/prevention/children.htm>).

<sup>xiv</sup> Income limits are based on FY2020 Fair Market Rent (FMR) for the Toledo, OH MSA with the following income limits for a four-person family: \$26,200 at 30% area median income (or AMI), \$35,950 at 50% AMI, \$57,500 at 80% AMI, and \$71,900 at 100% AMI.

<sup>xv</sup> 2013–2017 Comprehensive Housing Affordability Strategy (CHAS).

<sup>xvi</sup> 2020 National Housing Preservation Database

<sup>xvii</sup> U.S. Census Bureau, 2014–2018 American Community Survey 5-Year Estimates

<sup>xviii</sup> For more information, see <https://www.toledoblade.com/local/city/2019/02/01/toledo-redlining-neighborhoods-discrimination-black-white-african-american-poverty/stories/20190122141>.

<sup>xix</sup> U.S. Census Bureau, 2014–2018 American Community Survey 5-Year Estimates

<sup>xx</sup> U.S. Census Bureau, 2014–2018 American Community Survey 5-Year Estimates

<sup>xxi</sup> These strategies were cultivated throughout the planning process and are based on review of past local plans and studies, stakeholder engagement, data analysis, primary and secondary research, and alignment with priority housing needs.

<sup>xxii</sup> For more information see <https://centerforcommunityinvestment.org/sites/default/files/2019-01/Strengthening%20the%20Enabling%20Environment.pdf>.

<sup>xxiii</sup> From a review of past local plans and studies, including *Forward Toledo: An Exploratory Assessment to Inform Future Comprehensive Planning*, December 2020.

<sup>xxiv</sup> From a review of past local plans and studies, including *Forward Toledo: An Exploratory Assessment to Inform Future Comprehensive Planning*, December 2020.

<sup>xxv</sup> Missing middle housing types refer to housing types that are in between a single-family home and mid-rise apartment buildings, such as townhomes, duplexes, or garden-style apartments.

<sup>xxvi</sup> This was noted in multiple plans during a review of past local plans and studies conducted at the beginning of this project as well as in *Forward Toledo: An Exploratory Assessment to Inform Future Comprehensive Planning*, December 2020.

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<sup>xxvii</sup> Incremental development consists of small-scale changes to individual parcels through a mix of building scales and types and an intentional development pace. For Toledo, this can translate to an incremental removal of barriers that often impede infill development, such as minimum site and lot requirements. These types of projects will also provide a lower barrier to entry into the housing market because they can develop incrementally, piece by piece, without having to provide or absorb the large cost of infrastructure typical of many housing projects. In addition, this strategy can be implemented by working with partner organizations, current planning processes, and expediting permits of projects that fulfill infill requirements.

<sup>xxviii</sup> Rothstein, Richard. *The Color of Law: A Forgotten History of How Our Government Segregated America*. First edition. New York; London: Liveright Publishing Corporation, a division of W.W. Norton & Company, 2017.

<sup>xxix</sup> Development cost modeling was conducted as part of this comprehensive housing strategy. This revealed the need to use lower development costs in tandem with additional subsidy such as gap financing to increase overall financial feasibility. More information can be found in Appendix 3.

<sup>xxx</sup> From a review of past local plans and studies, including *Forward Toledo: An Exploratory Assessment to Inform Future Comprehensive Planning*, December 2020, and direct interviews with Toledo Plan Commission staff.

<sup>xxxi</sup> See Appendix 3 for more information.

<sup>xxxii</sup> Currently, Toledo Plan Commission staff encourages property owners to reach out to neighbors and neighborhood organizations when pursuing rezoning applications, but this can result in one cursory meeting that doesn't represent the varied interests of a community.

<sup>xxxiii</sup> "Strategic neighborhoods" refer to those with an organizational commitment by at least community partner or the City of Toledo. These include Neighborhood Revitalization Strategy Areas (City of Toledo); RISE Neighborhoods (Lucas County Land Bank); four neighborhoods or corridors identified in LISC Toledo's 2020-2025 Strategic Plan (see [https://www.lisc.org/media/filer\\_public/69/af/69af6176-8dbe-4b95-a1f9-8226a12d960f/lisc\\_toledo\\_2020-2025\\_strategic\\_plan\\_summary.pdf](https://www.lisc.org/media/filer_public/69/af/69af6176-8dbe-4b95-a1f9-8226a12d960f/lisc_toledo_2020-2025_strategic_plan_summary.pdf)) and Ebeid Neighborhood Promise (ProMedica).

<sup>xxxiv</sup> Many stakeholders shared that this type of tool was tried in the past—but ultimately wasn't designed or administered with consideration about the source's overall sustainability and uses. Implementation of this strategy aims to learn from past local experience.

<sup>xxxv</sup> For more about Franklin County's dedicated source of funding for housing activities see, <https://www.bizjournals.com/columbus/news/2019/08/22/one-community-franklin-county-ups-real-estate.html>.

<sup>xxxvi</sup> Recommendations included providing alternative code enforcement tracks or options; establishing clear code enforcement goals and priorities; centralizing and sharing tracking of data collection and information; using of equitable safeguards in the enforcement process; and continuing to foster and develop partnerships with internal city departments and community organizations such as the Lucas County Land Bank. The full code enforcement assessment completed by Center for Community Progress is available at [www.communityprogress.net/a-more-strategic-equitable-approach-to-housing-and-building-code-enforcement-in-toledo--ohio-atilde---acirc--nbsp--pages-602.php](http://www.communityprogress.net/a-more-strategic-equitable-approach-to-housing-and-building-code-enforcement-in-toledo--ohio-atilde---acirc--nbsp--pages-602.php).

<sup>xxxvii</sup> Community resource navigators provide hands-on support to residents, connecting them with resources that address their unique needs. Funds from the public and philanthropic organizations can provide grants that further the work of community resource navigators, which could include hiring Toledoans directly to increase local capacity for resource administration.

<sup>xxxviii</sup> The Community Reinvestment Area (CRA) is a direct incentive tax exemption program benefiting property owners who renovate existing or construct new buildings. This program permits municipalities or counties to designate areas where investment has been discouraged as a CRA to encourage revitalization of the existing housing stock and the development of new structures. (see [https://development.ohio.gov/bs/bs\\_comreinvest.htm](https://development.ohio.gov/bs/bs_comreinvest.htm)).

<sup>xxxix</sup> City of Toledo Department of Economic Development

<sup>xl</sup> Columbus, OH updated their CRA program to include housing goals in their program criteria. See [https://www.columbus.gov/uploadedFiles/Columbus/Departments/Development/Home\\_Page/CRA%20Map.pdf](https://www.columbus.gov/uploadedFiles/Columbus/Departments/Development/Home_Page/CRA%20Map.pdf).

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<sup>xlii</sup> There is a growing number of vacant properties, especially in areas where mostly renters live. The vacancy rate in Toledo is 15 percent. From 2010 to 2018, the vacancy rate increased by 1 percent (or 615 units). See Appendix 1 for the more analysis about vacancy in Toledo.

<sup>xliii</sup> This rental registry differs from the registration process for residential rental property required by the State of Ohio and managed by the Lucas County Auditor. While that registration requirement could be coordinated with the broader process to conduct inspections and resolve health and safety standards for rental homes in Toledo, the state's rental registration does not require a unit meet any minimum standard prior to being registered.

<sup>xliiii</sup> The data also shows that evictions were heavily concentrated in some low-income neighborhoods, and that individuals facing eviction were more likely to be Black or Latinx than white (see <https://www.toledofhc.org/wp-content/uploads/2020/03/City-of-Toledo-2020-2025-Analysis-of-Impediments-and-Fair-Housing-Action-Plan.pdf>).

<sup>xliiv</sup> *City of Toledo: Analysis of Impediments to Fair Housing Choice: 2020–2025*. Prepared by The Fair Housing Center. Available at [www.toledofhc.org/wp-content/uploads/2020/03/City-of-Toledo-2020-2025-Analysis-of-Impediments-and-Fair-Housing-Action-Plan.pdf](http://www.toledofhc.org/wp-content/uploads/2020/03/City-of-Toledo-2020-2025-Analysis-of-Impediments-and-Fair-Housing-Action-Plan.pdf).

<sup>xliiv</sup> A fair chance ordinance is a law adopted by a local jurisdiction (usually a city or county) that creates limits on the use of criminal records by landlords when they are screening prospective tenants. An advocate's toolkit on fair chance ordinances is available at [https://www.nhlp.org/wp-content/uploads/021320\\_NHLP\\_FairChance\\_Final.pdf](https://www.nhlp.org/wp-content/uploads/021320_NHLP_FairChance_Final.pdf).

<sup>xlivi</sup> Unions can provide an additional level of protection for workers' health and safety (see <https://www.epi.org/publication/why-unions-are-good-for-workers-especially-in-a-crisis-like-covid-19-12-policies-that-would-boost-worker-rights-safety-and-wages/>).

<sup>xliiii</sup> One example is Colony Lofts, a large, market-rate, mixed-use development, that has significantly higher labor costs due to its project labor agreement which was negotiated in exchange for a 15-year tax abatement, resulting in a request for HOME funds from the City of Toledo to offset these costs.

<sup>xliiii</sup> U.S. Census Bureau, 2014–2018 American Community Survey 5-Year Estimates; 2013–2017 Comprehensive Housing Affordability Strategy (CHAS).

<sup>xlix</sup> U.S. Census Bureau, 2014–2018 American Community Survey 5-Year Estimates.

<sup>i</sup> See Appendix 1 for additional analysis of neighborhood-level conditions in Toledo.

<sup>ii</sup> *City of Toledo: Analysis of Impediments to Fair Housing Choice: 2020–2025*. Prepared by The Fair Housing Center. Available at [www.toledofhc.org/wp-content/uploads/2020/03/City-of-Toledo-2020-2025-Analysis-of-Impediments-and-Fair-Housing-Action-Plan.pdf](http://www.toledofhc.org/wp-content/uploads/2020/03/City-of-Toledo-2020-2025-Analysis-of-Impediments-and-Fair-Housing-Action-Plan.pdf). It should be noted that the racist housing policies that created the need for increased use of public and private resources in historically redlined communities also complicate the benefits of homeownership in them. Research suggests the systemic undervaluing of black assets in these communities. One study conducted by Andre Perry at The Brookings Institution found, “homes in neighborhoods where the share of the population is 50 percent Black are valued at roughly half the price as homes in neighborhoods with no Black residents” (see [The Devaluation of Assets in Black Neighborhoods](#)).

<sup>iii</sup> A 2019 study conducted by the University of Toledo attributes the city's poverty rate to “the systems and social circumstances that dictate an individual's quality of life.” See [https://www.utoledo.edu/centers/urban-affairs/docs/Toledo%20Lucas%20County%20Poverty%20Report\\_UT%20Urban%20Affairs.pdf](https://www.utoledo.edu/centers/urban-affairs/docs/Toledo%20Lucas%20County%20Poverty%20Report_UT%20Urban%20Affairs.pdf).

<sup>liii</sup> In general, community development corporations (CDCs) are community-based organizations focused on supporting residents in a specific neighborhood through a range of activities, with affordable housing being a common one.

<sup>liv</sup> According to the Urban Institute, a general definition of blight “refers to a broad category of properties that experience disrepair, vacancy, abandonment, foreclosure, and environmental contamination.” See [www.urban.org/sites/default/files/publication/100464/pfs\\_and\\_blighted\\_properties\\_0.pdf](http://www.urban.org/sites/default/files/publication/100464/pfs_and_blighted_properties_0.pdf). This research brief highlights the historically racialized use of the term blight, which was used to describe urban places and used in policies, such as urban renewal, to seize Black- and African American-owned property. Blight in the context of this reports uses the term in its general sense.

<sup>lv</sup> U.S. Census Bureau, 2014–2018 American Community Survey 5-Year Estimates; 2013–2017 Comprehensive Housing Affordability Strategy (CHAS).

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<sup>lvi</sup> According to CityLab University, community land trusts are “community-run, nonprofit landholding organizations that sell or rent the unit atop the land they own, usually with the intent of keeping that housing affordability in perpetuity.” For more on shared-equity homeownership models, visit [www.bloomberg.com/news/articles/2019-04-29/alternative-homeownership-land-trusts-and-co-ops](http://www.bloomberg.com/news/articles/2019-04-29/alternative-homeownership-land-trusts-and-co-ops).

<sup>lvii</sup> Informant interview conducted for Toledo’s Comprehensive Housing Strategy, April 2021.

<sup>lviii</sup> Based on data from the 2018 American Community Survey Five-Year Estimates, in 2018, the median income among Black households was \$24,835, 33 percent lower than the median household income in Toledo (\$37,100). Black households make up a disproportionate share of households making under \$25,000 annually, when compared to white and Hispanic households.

<sup>lix</sup> *City of Toledo: Analysis of Impediments to Fair Housing Choice: 2020–2025*. Prepared by The Fair Housing Center. Available at [www.toledofhc.org/wp-content/uploads/2020/03/City-of-Toledo-2020-2025-Analysis-of-Impediments-and-Fair-Housing-Action-Plan.pdf](http://www.toledofhc.org/wp-content/uploads/2020/03/City-of-Toledo-2020-2025-Analysis-of-Impediments-and-Fair-Housing-Action-Plan.pdf). According to the Analysis of Impediments, rental complaints make up 74 percent of the center’s caseload, followed by real-estate sales (7 percent of the center’s caseload).

<sup>lx</sup> *City of Toledo: Analysis of Impediments to Fair Housing Choice: 2020–2025*. Prepared by The Fair Housing Center. Available at [www.toledofhc.org/wp-content/uploads/2020/03/City-of-Toledo-2020-2025-Analysis-of-Impediments-and-Fair-Housing-Action-Plan.pdf](http://www.toledofhc.org/wp-content/uploads/2020/03/City-of-Toledo-2020-2025-Analysis-of-Impediments-and-Fair-Housing-Action-Plan.pdf). Also noteworthy is the race and ethnicity of The Fair Housing Center’s clients: African American/Black individuals made up the largest share (44 percent of all City of Toledo clients), followed by white individuals (37 percent). Only 4 percent of individuals served by The Fair Housing Center identified as Hispanic.

<sup>lxi</sup> This report, prepared by UC Davis Center for Regional Change, highlights some lessons learned from successful public education campaigns focused on housing: face-to-face communication and presentations with small groups and individuals; social marketing tools used in tandem with community organizing; affordable housing’s positive impact on economic strength and stability. See <https://regionalchange.ucdavis.edu/sites/g/files/dgvnsk986/files/inline-files/AARPPProjectReport022916rios1.pdf>.

<sup>lxii</sup> This type of funding already exists for use in four Toledo neighborhoods through partnerships with community leaders, anchor institutions (such as ProMedica), and LISC, who have pooled together capital to address neighborhood-level housing conditions (see [www.lisc.org/media/filer\\_public/26/1e/261e34fc-2acd-48f1-9502-56754a8111df/lisc\\_strat\\_plan\\_2019-compressed\\_1025.pdf](http://www.lisc.org/media/filer_public/26/1e/261e34fc-2acd-48f1-9502-56754a8111df/lisc_strat_plan_2019-compressed_1025.pdf)). This strategy would expand this approach to serve other neighborhoods in Toledo not currently served by this funding source.

<sup>lxiii</sup> The Kirwan Institute at The Ohio State University. (2016). “The Effects of Lead Poisoning on African-American and Low-Income Families in Toledo, OH.” Report prepared for the Toledo Lead Poisoning and Prevention Coalition. Available at <http://kirwaninstitute.osu.edu/wp-content/uploads/2017/05/2016-04-04-TLPPC-Lead-Report.pdf>. According to this study, “African American children are concentrated in the areas of Toledo with the oldest housing and the highest predicted blood lead levels.”

<sup>lxiv</sup> Different administration models are in use for similar funds in Ohio. For instance, the City of Columbus administers its LeadSafe Fund, whereas the City of Cleveland and philanthropic partners capitalized its LeadSafe Fund, and then worked with a community partner to administer the program.

<sup>lxv</sup> 2013–2017 Comprehensive Housing Affordability Strategy (CHAS).

<sup>lxvi</sup> See Appendix 3 for a full summary of findings related to the use of OHFA’s multifamily development programs in Toledo.

<sup>lxvii</sup> More about the history of the discriminatory practices that contributed to current housing conditions and the push for more fair housing protections by Black and African American residents over the last several decades can

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be found here: [www.toledoblade.com/local/city/2019/02/01/toledo-redlining-neighborhoods-discrimination-black-white-african-american-poverty/stories/20190122141](http://www.toledoblade.com/local/city/2019/02/01/toledo-redlining-neighborhoods-discrimination-black-white-african-american-poverty/stories/20190122141).

<sup>lxviii</sup> Small-value or small-dollar mortgages are mortgages up to \$70,000 for home purchases, refinances, or improvements. Obtaining a mortgage for these properties can be more difficult because the loan size is too small to be attractive to conventional lenders, rendering a potentially lower cost pathway to homeownership unavailable to many households (unless they can assemble the cash resources necessary to purchase the property outright). Toledo stakeholders shared that appraisal gaps (i.e., the difference between appraised value and market value of a home) pose a barrier when looking to buy or renovate a home in parts of Toledo. It also affects the City of Toledo's and Lucas County Landbank's ability to successfully rehabilitate and resell homes, as the rehabilitated homes may appraise for less than the rehabilitation cost. Appraisal gaps are common in low-cost areas with few market transactions, which are typically used to determine the relative value of a home (although this system historically has not valued white and Black-owned property equally).

<sup>lxix</sup> This tax relief would be supplemental to existing homeownership tax relief (such as Lucas County's Homestead Exemption Program or Ohio's Owner-Occupied Credit).

<sup>lxx</sup> 2013–2017 Comprehensive Housing Affordability Strategy (CHAS).

<sup>lxxi</sup> 2013–2017 Comprehensive Housing Affordability Strategy (CHAS).

<sup>lxxii</sup> See this blog post from the Urban Institute for more the use of a blight elimination charter in Memphis, TN area: [www.urban.org/urban-wire/lessons-memphiss-collaborative-campaign-against-blight](http://www.urban.org/urban-wire/lessons-memphiss-collaborative-campaign-against-blight).

<sup>lxxiii</sup> "Strategic neighborhoods" refer to those with an organizational commitment by at least community partner or the City of Toledo. These include Neighborhood Revitalization Strategy Areas (City of Toledo); RISE Neighborhoods (Lucas County Land Bank); four neighborhoods or corridors identified in LISC Toledo's 2020-2025 Strategic Plan (see [https://www.lisc.org/media/filer\\_public/69/af/69af6176-8dbe-4b95-a1f9-8226a12d960f/lisc\\_toledo\\_2020-2025\\_strategic\\_plan\\_summary.pdf](https://www.lisc.org/media/filer_public/69/af/69af6176-8dbe-4b95-a1f9-8226a12d960f/lisc_toledo_2020-2025_strategic_plan_summary.pdf)) and Ebeid Neighborhood Promise (ProMedica).

<sup>lxxiv</sup> For more about pay for success models to address blight, see [www.urban.org/sites/default/files/publication/100464/pfs\\_and\\_blighted\\_properties\\_0.pdf](http://www.urban.org/sites/default/files/publication/100464/pfs_and_blighted_properties_0.pdf).

<sup>lxxv</sup> For a step-by-step guide to develop resident-led blight plans, visit [https://taubmancollege.umich.edu/pdfs/student\\_work/planning/blight\\_on\\_the\\_block.pdf](https://taubmancollege.umich.edu/pdfs/student_work/planning/blight_on_the_block.pdf).

<sup>lxxvi</sup> For a round-up of different self-assessment tools, see NeighborWorks' Community Development Evaluation: Story Map and Legend. Available at <https://community-wealth.org/sites/clone.community-wealth.org/files/downloads/tool-nw-evaluation.pdf>.